

NAVAL FACILITIES ENGINEERING COMMAND Washington, DC 20374-5065

NFESC INTERIM DRAFT USER'S GUIDE UG-XXXX-ENV

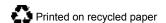
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA) ADMINISTRATIVE RECORD MANAGEMENT SYSTEM (ARMS) USER'S GUIDE

by

NAVFAC ARMS WORK GROUP

December 2000

Approved for public release; distribution is unlimited.



FOREWORD

The purpose of this document is to provide the Naval Facilities Engineering Command (NAVFACENGCOM) Engineering Field Divisions/Engineering Field Activities (EFDs/EFAs) with a step-by-step guide for:

- Ensuring the Administrative Record File (ARF) is complete using the guidance from the Environmental Protection Agency (EPA), the Department of Defense (DOD), and the Department of the Navy (DON).
- Converting the ARF from paper to electronic format. This format includes fiche, film, Compact Disc Read Only Memory (CD-ROM), magnetic tape, or an optical disk platter.
- Converting the ARF from native electronic files to electronic format.

The DON/DOD cleanup program began with the passage of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). Passage of the Superfund Amendments and Reauthorization Act (SARA) in 1986 brought all federal facilities under the CERCLA program. SARA required the DON to follow EPA rules. Section 113K of the CERCLA as amended by SARA requires the establishment of an Administrative Record (AR) which forms the basis for the selection of a response action. The ARF includes the final records which are a part of the DON's decision-making process.

Requests for copies, comments, suggestions, and updates to this User's Guide may be sent to:

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Electronic copies are available on the internet at: http://enviro.nfesc.navy.mil/erb/erb a/support/wrk grp/arms/ARMSGuide.pdf

NAVAL FACILITIES ENGINEERING COMMAND DISCLAIMER

This User's Guide describes various options for converting a paper version of the Administrative Record to electronic format. A chapter has been added which describes options for converting electronic files to electronic format. The Naval Facilities Engineering Command does not guarantee the accuracy of the conversion from paper to electronic format. A complete and accurate copy of the Administrative Record shall be available to the public at or near the facility as required by CERCLA Section 113(k)(1).

ACKNOWLEDGMENT

We wish to thank everyone who contributed to this document. The work group was chartered on 13 December 1993 by NAVFACENGCOM Headquarters (HQ). The first committee meeting was held on 4 February 1994. The work group was renamed the Administrative Record Management System (ARMS) Committee. Each EFD/EFA, the Naval Facilities Engineering Service Center (NFESC), and NAVFACENGCOM HQ are represented.

Work Group

The purpose of the work group is to investigate, recommend, develop, and implement an automated Administrative Record Management System for the environmental field offices using local area networks and stand-alone personal computers.

Members Organizations:

NAVFACENGCOM LANTDIV SOUTHDIV SOUTHWESTDIV, EFA WEST PACDIV EFA NORTHEAST EFA CHES EFA NORTHWEST NFESC

Advisors:

NAVFACHQ Chief Information Officer Subject Matter Experts as needed.

Responsibilities:

- Review and improve Administrative Records record management process.
- Investigate possible methods of electronic storage and distribution of the Administrative Records information.
- Provide written guidance and standards required for implementation of AR management system.
- Ensure ARMS is cost effective.
- Provide feedback from ARMS users to the NAVFAC associates on likes and dislikes and recommended priorities for necessary adjustments.
- Provide <u>recommendations</u> to NAVFACHQ functional manager (e.g., policy changes, resources, etc.).
- Coordinate ARMS activities within their command and keep associates informed on the progress.

Accomplishments:

- Adopted indexing standards/definitions for record identification to conform with the U.S. EPA guidance and existing definitions.
- Estimated the total retrospective conversion page count and future volume of paper records for each EFD/EFA.
- Obtained quotes from varied contractors for electronic conversion both on-site and off-site.
- Reviewed the laws governing Administrative Record Files.
- Surveyed Base Environmental Offices and public repositories in order to determine their hardware and network capabilities.
- Published ARMS User's Guide
- Published Revised ARMS User's Guide containing guidance for electronic to electronic conversion
- Maintain ARMS web site information at http://enviro.nfesc.navy.mil/erb/erb a/support/work grp/arms

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CHAPTER I

PURPOSE

The purpose of this document is to provide the Naval Facilities Engineering Command (NAVFACENGCOM) and Engineering Field Divisions/Engineering Field Activities (EFDs/EFAs) with a step-by-step guide for:

- Ensuring the Administrative Record File (ARF) is complete using the guidance from the Environmental Protection Agency (EPA), the Department of Defense (DOD), and the Department of the Navy (DON) (Refs 1 and 2).
- Converting the ARF from paper to electronic format. This format includes fiche, film, CD-ROM, magnetic tape, an optical disk platter, or a web page.
- Converting the ARF from native electronic files to electronic format.

Generic samples have been provided in this guidebook and can be tailored for each EFD/EFA. Appendixes A through G are core documentation for implementing an ARF. The samples and appendixes are available on the following internet address:

http://enviro.nfesc.navy.mile/erb/erb a/support/wrk grp/ARMS/armsguide.pdf

The NAVFACENGCOM is comprised of eight EFDs/EFAs. Each is responsible for the management and distribution of their Administrative Record (AR). The need is to establish an Administrative Record Management System (ARMS) and the means to receive future documents in an electronic format and to convert existing records from paper to electronic format.

Currently, many ARs consist of volumes of paper that contain reports, letters, data, recommendations, drawings, photographs, etc. Paper records can become cumbersome and costly in terms of handling, record management, access requirements, distribution, space allocation, and retention or storage. However, the original paper copy should be retained after an automated record management system has been implemented, as it is the official legal copy.

PAPER ARF VERSUS ELECTRONIC ARF AS THE LEGAL COPY

Please refer to EPA Series No. 019, records schedule for EPA administrative records, which, at this point, only allows for paper or microform. Please note the EPA Series 019 cites a 30-year period for keeping files. However, EPA is referring to hazardous waste files. The new Navy disposition manual has created a new category for Administrative Record files, SSIC 5090.3, which specifically states that the retention period for CERCLA records is 50 years.

The EPA has not formally addressed the issue since they wrote their regulations. Originally, they required an ARF paper record (circa 1989-90), no matter what other format documents may have been created in or currently exist in.

The federal courts and some state courts, however, have subsequently ruled that they will accept "microform" as long as it can be documented (chain-of-custody) and proved that the material/documents/records contained on the microform have been properly handled and protected. (The court decision did not specifically address the ARF. The ruling was a general ruling addressing electronic documents.) The EPA says that they go along with this ruling but they have never put anything in writing regarding the ARF.

One EFD developed the policy/philosophy that the PAPER ARF IS THE LEGAL VERSION. No matter how a document began "life" (electronic, CD-ROM, microfilm, etc.), a paper copy is generated for their legal record which is held under tight access at the EFD. The paper copy is the version which is described in the ARF database. However, the EFD also keeps the electronic versions of documents. The EFD does not consider web based, CD-ROM, or dedicated server versions of the Administrative Record Files to be the legal copies. It is an easy and useful way to find information, but not a collection of legal documents.

If a case goes to court, OSWER Directive #9833.3A-1 (Ref 2), Section K gives guidance for certifying the Administrative Record. Appendix K of OSWER and Appendix H of this guide contain the form to do so.

The software and technology revolution may leave the electronic version(s) of the ARF behind; web sites are ephemeral. Paper lasts and it lasts a lot longer than ANY OTHER STORAGE MEDIUM (low-tech microfilm/fiche is close) (ask a Records Manager). It is recommended by this team that one paper copy is kept.

The EFD has contractors submit electronic versions of documents as well as one paper copy for the records manager (the electronic versions of documents are great for converting to web based searching, CD-ROMs, dedicated servers, etc.). The RPMs see the logic and wisdom of this request and write the requirement into their Scopes of Work, making it standard operating procedure.

CHAPTER II

ADMINISTRATIVE RECORD

DEFINITION

An Administrative Record (AR) is the combination of records and other material that forms the basis for remedy selection for a response action implemented at an installation restoration site.

PURPOSE

The administrative record will be the basis for any future legal review of decisions made concerning remedial action taken at a site by the Navy/Marine Corps under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) response action. It also serves as a vehicle for public participation in the selection of a response action.

AUTHORITY

Appendix A provides the authority for the Administrative Record File (ARF). The ARF refers to the records as they're being established and maintained. Until a response action decision has been selected, there is no complete administrative record for that decision. Thus, to avoid creating the impression that the record is complete at any time prior to the final selection decision, the set of records is referred to as the ARF rather than the AR.

DISPOSITION

National Archives Records Administration (NARA)

Under the authority of NARA, the Navy and Marine Corps Records Disposition Manual, SECNAVINST 5212.5D, dated 22 April 1998, authorizes the Navy and Marine Corps disposition schedule by Standard Subject Identification Codes (SSIC). For additional information about NARA, the web site is http://www.nara.gov/.

The disposition instruction can be found at http://neds.nebt.daps.mil/Directives/dirindex.html. This site is the Navy Electronic Directives System and lists Tables for Office of the Chief of Naval Operations (OPNAV) and the Secretary of the Navy (SECNAV) instructions. SECNAVINST 5212.5D, Navy and Marine Corps Disposition Manual, can be found at this site on Table 47.

Disposition of Laboratory Data

NARA Federal Records Centers can store raw or validated data. Contact the NARA Headquarters for storage prices. At this time, Federal Records Centers are less expensive than commercial storage.

The Navy considers an installation to have one ARF no matter how many sites there are at the installation. Until all sites are closed, the ARF remains open. The ARF must be retained for 50 years. SECNAVINST 5212.5D, SSIC 5090.3, defines the retention period. The 50-year countdown begins three years after the IR program at the installation is completed.

SAMPLE SHEETS

Samples of a Public Availability Information Legal Notice and Administrative Record File Fact Sheet are provided for EFD/EFA use.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

PUBLIC AVAILABILITY INFORMATION

LEGAL NOTICE

NOTICE OF AVAILABILITY OF ADMINISTRATIVE RECORD AND 30 DAY PUBLIC COMMENT PERIOD (SITE NUMBER AND NAME HERE) REMOVAL ACTION

The Administrative Record, which documents the Navy's decision to undertake a Response Action for cleanup of a spill, is available for public review. The Administrative Record is located at *(enter location, POC, phone)* for review.

Written comments on the Administrative Record should be mailed, faxed or e-mailed to:

(enter POC name)
(enter POCs title)
(enter address)
(enter fax number)
(enter e-mail address)

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ADMINISTRATIVE RECORD FILE FACT SHEET

The Administrative Record File (ARF) for the (insert Base/Activity) is a collection of records considered by the Department of the Navy (DON) in the selection of environmental response actions for the Installation Restoration Program currently underway.

The ARF serves two purposes. First, it provides access to site-specific information so that the public may make informed comments to the DON on the selection of response actions. Second, if the adequacy of a response decision is challenged in court, the judicial review of that decision may be largely based on the records in the ARF. This file is consistent with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

The ARF is available for public review. It is treated as a non-circulating reference record. This will allow public access to the records and minimize the risk of loss or damage. Individuals may copy any record contained in the ARF according to the copying procedures at the local repository.

The ARF is crucial to the public because it contains information upon which the selections of interim and final response actions will be based. Technical studies and significant correspondence among government agencies are included in the ARF, as well as those records which reflect notification and participation of the public in the site activities. The consideration and response by the Navy to those comments are also incorporated into the ARF. Examples of information found in the ARF include:

sampling data work plans
guidance & policy health/risk evaluations
technical studies media notices
decision records proposed cleanup plans
correspondence meeting minutes

work plans
media notices
public information materials
court orders and decrees
meeting minutes

Records containing sensitive information are placed in the confidential portion of the ARF. This part of the ARF is maintained in a secured area. Confidential material is not accessible to the public; however, to the extent feasible, summaries of the records will be made available in the open portion of the ARF.

Records in the ARF are listed in an index. The index contains bibliographic information and the physical location of each record.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

The ARF is a work in progress. Records will be added as studies are conducted; for this reason, some volumes or sections of volumes may contain few or no records at this time. If records in the ARF are damaged or lost during use, please contact the (Insert name of point of contact) in order to obtain replacement material.

(Insert designated point of contact) welcomes comments at any time on environmental activities. Formal comment periods are held at certain stages of the response process. The public is urged to use these formal comment periods to review the ARF and submit comments on proposed actions. For further information please contact:

POINT OF CONTACT

Name, Position Title Activity Name Activity Address City, State, Zip Code

Telephone Number E-mail address

CHAPTER III

IMPLEMENTING THE ARMS PROCESS

Note that you may have completed certain steps in the process of converting paper to electronic files. As you read this document, review what you have accomplished and begin wherever you feel is best for your needs.

Figure 1 illustrates the Six Step Process.

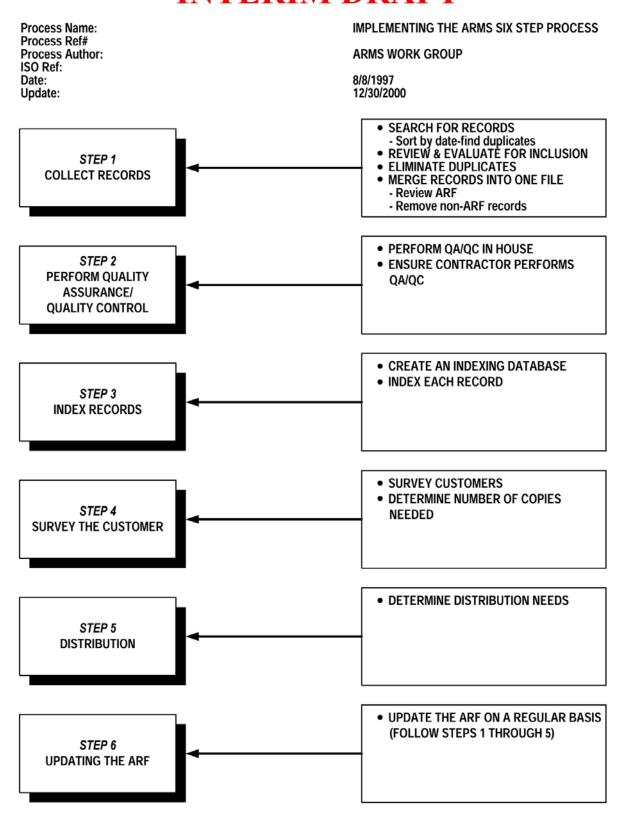


Figure 1. ARMS SIX STEP PROCESS

STEP ONE - RESEARCHING AND ORGANIZING THE RECORD*

Purpose

- Determine point of contact for activity.
- Determine if there is an existing AR.
- Determine prior responsible parties for historical information.
- Ascertain if there are any procedures in place for recording and indexing the record.
- Determine if Information Repository has been established, and if so, contents.
- Determine if there is a database containing an index.
- Locate and research existing records.
 - Remove duplicates
 - Look for originals
 - Remove Non-ARF documents and records
 - Check potential ARF documents against any existing paper record or database

Contributors

The following is a list of possible contributors but is not limited to:

- 1. Engineer in Charge
- 2. Remedial Project Managers
- 3. On-site coordinators
- 4. Contractors
- 5. Regional Counsel staff
- 6. Federal agencies
- 7. State agencies
- 8. CERCLA contractors
- 9. The public
- 10. Other groups or individuals concerned with the response action

ORGANIZING PAPER FILES*

Purpose

The file should be compiled as relevant records on the response action are generated or received. The records must be reviewed and evaluated to ensure ARF accuracy and completeness.

• Review and evaluate records for inclusion in the ARF.

*Refer to OSWER Directive No. 9833.3A-1, Section II, <u>Procedures for Establishing the Administrative Record.</u>

- This evaluation will be done by the RPMs, the ARC and/or by the activity personnel as appropriate for each EFD/EFA. Frequent consultation between Base personnel and EFD/EFA personnel may be necessary.
- Select records for inclusion and eliminate duplicates.
 - Gather guidance and compendium records.
 - Always add to the compendium records. Keep all compendium records for preserving historical decision making process.
- Organize records into one file.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

GUIDE FOR ARF RECORD COLLECTION

Suggestions for Implementing Collection of Non-Deliverables

This file is for all items that are not deliverables. Documents include, but are not limited to, original incoming and outgoing correspondence, e-mails, memorandums, letters, facsimilies, etc. If unsure whether the record belongs in the ARF, consult the Administrative Records Coordinator (ARC).

- 1. All original incoming and outgoing correspondence pertaining to the Administrative Record shall be forwarded to the Administrative Record Coordinator.
- 2. Multiple file collection areas can be set up for the convenience of the project manager as follows:
 - Separate files into quarters:

JANUARY 1 TO MARCH 31 APRIL 1 TO JUNE 30 JULY 1 TO SEPTEMBER 30 OCTOBER 1 TO DECEMBER 31

The ARC will be on the distribution list for all administrative records deliverables. Please refer to page 23 for the AR checklist for guidance.

Notify the ARC if you are aware of other records which may have been sent to the local public repository without the knowledge of the ARC.

If you have an ARC, consult with them regarding procedures.

Suggestions for Implementing Collection of Deliverables

Ensure that the ARC is on the distribution list for deliverables. Before contract is closed, ask the Contractor or the Contract's office for a list of deliverables, plans, reports, etc., to check against the ARF index database. The close-out report may contain non CERCLA information; you may want to include the information if it covers tanks, etc. Each EFD/EFAs contract section may have a form designed for this purpose. Please see the samples at the end of this chapter.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

TYPICAL ADMINISTRATIVE RECORDS

THIS IS NOT A COMPREHENSIVE LIST. There is no comprehensive list. The guidelines are flexible enough to cover the inclusion of a variety of materials.

	Project Phases	TYPICAL REMEDIAL ACTION DOCUMENTS
	Preliminary Assessment Site Inspection	 Preliminary Assessment (PA) Report Site Inspection (SI) Work Plan Site Investigation Report Site Inspection Sampling and Analysis Plan (SAP) Site Inspection Quality Assurance Project Plan (QAPP) Site Inspection Health & Safety Plan (FSP) Site Inspection Field Sampling Plan (FSP) Site Inspection Chain of Custody Forms Raw Analytical Data Data Summary Data Site Inspection Report
-	RI/FS Phase	 Remedial Investigation/Feasibility Study Work Plan (final approval) Remedial Investigation/Feasibility Study Work Plan Amendments Remedial Investigation Sampling & Analysis Plan (SAP) Remedial Investigation Quality Assurance Project Plan (QAPP) Remedial Investigation Health & Safety Plan (HSP) Remedial Investigation Field Sampling Plan (FSP) Remedial Investigation Chain of Custody Forms Raw Analytical Data Inspection Reports Data Summary Sheets
-	RI/FS Completed	 Remedial Investigation Report Feasibility Study Report Data Submitted by the Public Comments/Responses on RI/FS Reports Remedial Investigation/Feasibility Reports (as available for public comment and as final, if different) Technical Studies Alternative Technologies/Treatability Studies Human Health Risk Assessment Ecological Risk Assessment Engineering Evaluation/Cost Analysis
	Policy & Guidance	 Guidance Documents Technical Literature Technical Studies performed for the site Memos on Site-Specific or Issue-Specific Policy Decisions

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PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

TYPICAL ADMINISTRATIVE RECORDS

THIS IS NOT A COMPREHENSIVE LIST. There is no comprehensive list. The guidelines are flexible enough to cover the inclusion of a variety of materials.

	Project Phases	TYPICAL REMEDIAL ACTION DOCUMENTS
	General	 Site Management Plans Site Photographs/Maps ATSDR Health Assessment Letters to Regulators Requesting Identification of ARARs Responses from Regulators Identifying of ARARs Notice to Regulators Regulators Comments on drafts, draft finals, and final RI/FS Correspondence and Memos to and from government agency to regulator agency
-	Public Participation	 Community Relations Plan Newspaper Articles Showing General Community Awareness Fact Sheets or Summary Information Regarding Remedial Action Alternatives Proposed Plan Letters forwarded to persons on the community relations mailing list, including associated data and mailing list for each document. Public Notices Public Comments and Agency Responses Responses to Comments from State/Federal Agencies Responses to Significant Comments Received from the Public Concerning the Selection of a Remedial Action Transcripts of Formal Public Meetings Written Comments on Selected Remedy Submitted by the Public
		 Documentation of Substantive Oral Comments on Selected Remedy Regulators Concurrence, Non-concurrence, or Comments on the Proposed Plan and Responses to Comments Other Federal Agency Documents (Army Corps of Engineers, Department of Interior, etc.) Congressional Correspondences National Resources Trustee Notices and Responses, Findings of Fact Responsiveness Summary
	Record of Decision	 Record of Decision (ROD) Amendments to ROD Explanation of Significant Differences Post ROD

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PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

TYPICAL ADMINISTRATIVE RECORDS

THIS IS NOT A COMPREHENSIVE LIST. There is no comprehensive list. The guidelines are flexible enough to cover the inclusion of a variety of materials.

Project Phases	TYPICAL REMEDIAL ACTION DOCUMENTS
. Enforcement Documents	 Notice letters to PRPs Administrative Orders Consent Decrees
. Enforcement Documents "Include only if relevant to the selection of removal action"	 Administrative Orders Consent Decrees
. Base Realignment and Closure (BRAC)	 Environmental Baseline Survey (EBS) BRAC Cleanup Plan Base Closure Plan Closure Notifications

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

TYPICAL ADMINISTRATIVE RECORDS

THIS IS NOT A COMPREHENSIVE LIST. There is no comprehensive list. The guidelines are flexible enough to cover the inclusion of a variety of materials.

Typical Removal	
Action Activities	TYPICAL REMOVAL ACTION DOCUMENTS
Preliminary Assessment Site Inspection	 Preliminary Assessment (PA) Report Site Inspection (SI) Work Plan Site Inspection Sampling and Analysis Plan (SAP) Site Inspection Quality Assurance Project Plan (QAPP) Site Inspection Health and Safety Plan (H&SP) Site Inspection Sampling Plan (FSP) Site Inspection Chain of Custody Forms Raw Analytical Data Data Summary Sheets Site Reports
RI/FS Phase	 Remedial Investigation/Feasibility Study Work Plan (final approval) Remedial Investigation/Feasibility Study Work Plan Amendments Remedial Investigation Sampling & Analysis Plan (SAP) Remedial Investigation Quality Assurance Project Plan (QAPP) Remedial Investigation Health & Safety Plan (HSP) Remedial Investigation Field Sampling Plan (FSP) Remedial Investigation Chain of Custody Forms Raw Analytical Data Inspection Reports Data Summary Sheets
RI/FS Completed	 Remedial Investigation Report Feasibility Study Report Data Submitted by the Public Comments/Responses on RI/FS Reports Remedial Investigation/Feasibility Reports (as available for public comment and as final, if different) Technical Studies Alternative Technologies/Treatability Studies Human Health Risk Assessments Engineering Evaluation/Cost Analysis (EE/CA)
Policy & Guidance	Guidance Documents Technical Literature Technical Studies Performed for the Site Memos on Site-Specific or Issue-Specific Policy Decisions Action Memorandum
General	 Site Management Plan ATSDR Health Assessment Letter to Regulators Requesting Identification of ARARs Response from Regulators Identifying ARARs Notices to Regulators Regulators Comments on drafts, draft finals, finals of the RI/FS Correspondence and Memos

CONTINUED

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

TYPICAL ADMINISTRATIVE RECORDS

THIS IS NOT A COMPREHENSIVE LIST. There is no comprehensive list. The guidelines are flexible enough to cover the inclusion of a variety of materials.

-	Typical Removal Action Activities	TYPICAL REMOVAL ACTION DOCUMENTS
	Public Participation	 Community Relations Plan Newspaper Articles Showing General Community Awareness Fact Sheets or Summary Information Regarding Remedial Action Alternatives Proposed Plan Letters forwarded to persons on the community relations mailing list, including associated data and mailing list for each document. Public Notices Public Comments and Agency Responses Responses to Comments from State/Federal Agencies Responses to Significant Comments Received from the Public Concerning the Selection of a Remedial Action Transcripts of Formal Public Meetings Written Comments on Selected Remedy Submitted by the Public Documentation of Substantive Oral Comments on Selected Remedy Regulators Concurrence, Non-concurrence, or Comments on the Proposed Plan and Responses to Comments Other Federal Agency Documents (Army Corps of Engineers, Department of Interior, etc.) Congressional Correspondences National Resources Trustee Notices and Responses, Findings of Fact Responsiveness Summary
	Enforcement Documents "Include only if relevant to the selection of removal action"	 Notice letters to PRPs Administrative Orders Consent Decrees
	Base Realignment and Closure (BRAC)	 Environmental Baseline Survey (EBS) BRAC Cleanup Plan Base Closure Plan Closure Notifications

For non-time-critical, AR is placed at site when EE/CA is made available to the public. 1

For time-critical, AR is placed at site within 60 days of when removal activities are initiated. 2

For emergency (30 days or less), AR may be made available only at the Regional office location. 3

- 1. OSWER Directive 9833.3A-1 December 3, 1990 Figure 3, Time Critical, Page 15
- 2. OSWER Directive 9833.3A-1, December 3, 1990, Page 16
- 3. OSWER Directive 9833.3A-1, December 3, 1990, Page 15, Figure 3.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

INCLUDE DOCUMENTS IF CONSIDERED OR RELIED ON

The following list of documents is not routinely used in the decision for selecting a response action. If, however, these documents contain information considered or relied on in the response action selection and the information is not contained elsewhere, then the documents should be included in the CERCLA ARF. "THIS IS NOT A COMPREHENSIVE LISTING."

Asbestos Reports

BRAC Cleanup Plans (BCP)

Change Notices

Cost Reports

Daily Work Reports

Delivery Orders (contractual records)

Financial Reports

Hazard Ranking System

Interagency Agreements

Internal Notes (between contractor and DON)

Internal Meeting Agendas (between contractor and DON)

Internal Meeting Minutes (between contractor and DON)

Internal Briefing Records (between contractor and DON)

Invoices

Modifications

Monthly Progress Reports

Narrative Summaries

Negotiations

On-Site Registers and Logs

Pollution Prevention Assessment Reports

Purchase Orders

Quality Assurance/Quality Control Records

Removal Response Subcontractor Records

Responses to Technical Directions

Rule Making Docket Information

Schedule Changes

Site Access Records

Site Closeout Report

Site Security Records

Storm Water Reports

Technical Direction Letters

Telephone Conversations (between DON and Contractor)

Underground Storage Tank Reports

TYPICAL COMPLIANCE DOCUMENTS

The following is a list of documents considered to be compliance documents. These documents are to be forwarded to the Environmental Library where they are inventoried into the master database, assigned a unique document number, and filed. Due to limited space in the Environmental Library, compliance documents may be stored off-site. If any of these documents contain information that is considered or relied on in the response action selection and that is not contained elsewhere in the CERCLA Administrative Record (AR) file, the documents should be included in the AR. "THIS IS NOT A COMPREHENSIVE LISTING."

TOPIC	DOCUMENT		
General	Environmental Impact StatementEnvironmental Compliance Evaluation (ECE)		
Clean Air Act (CAA) Requirements	 Aboveground Storage Tanks (AST) Hazardous Air Pollutants Source Emission New Source Review Permit Title III 112(r) - Regulated Substances Inventory/Risk Management Plan Title V Permit 		
Resource Conservation and Recovery Act (RCRA) Requirements	 Hazardous Waste management Plan Solid Waste Management Unit (SWMU) Cleanup 		
Solid Waste Requirements (RCRA-D)	Solid Waste Management Plan		
Ordnance Relation Requirements	Groundwater Monitoring of RCRA Permitted Units		
Safe Drinking Water Act (SDWA) Requirements	Develop Operation and Maintenance (O&M) Program/Manual		
Toxic Substances Control Act (TSCA) Requirements	 PCB Removal, Replacement, Retrofill and/or Disposal per TSCA Sampling and Analysis for PCB Content PCB Elimination Plan LBP Evaluation and Abatement Radon Testing 		
	PCB Spill Cleanup		

TYPICAL COMPLIANCE DOCUMENTS (Continued)

TOPIC	DOCUMENT
RCRA Underground	UST Remedial Investigation
Storage Tank (UST)	UST Remediation
Requirements	UST Closure/Change in Service
	Storage Tank Management Plan
Clean Water Act (CWA) Requirements	 National Pollutant Discharge Elimination System (NPDES) Permit Application/Renewal
	Stormwater Pollution Prevention Plan (SWP3)
	Illicit Discharge Survey
	Elimination of Illicit Connections to Storm Sewers
	Design/Construct BMP and Stormwater Management Structures
	Stormwater Management Plans
	 Service & Repair of BMP and Stormwater Management Equipment & Facilities
	NPDES (Direct Discharge) Compliance Monitoring
	Phase II Stormwater permitting
	Industrial Wastewater Disposal
Oil and Hazardous	OP090 Facility Response Plans
Substances Spill Prevention and	Update SPCC Plans
Response	SPCC Corrective Actions
Requirements	Integrated Contingency Plan
Pollution Prevention	Pollution Prevention Assessment Reports
and Executive Order	Installation Pollution Prevention Plans
Requirements	Toxic Release Inventory Reporting (Form R Reporting)
	Other EPCRA (Non-TRI) Reporting
	Pollution Prevention (P2) Equipment Site Preparation

ARF RECORDS THAT REQUIRE SPECIAL HANDLING

ARCHEOLOGICAL SITE INFORMATION

This information is prohibited from inclusion in the ARF. The actual coordinates cannot be released to the public, in order to protect the site from harm. The team recommends directing inquiries to the Public Affairs Officer (PAO), the Freedom of Information Act (FOIA) point of contact, or a designated point of contact.

RAB SIGN-IN SHEET

The sign-in list that Restoration Advisory Board (RAB) members and attendees fill out can contain sensitive, privileged information. This personal information cannot be distributed to the general public. The sign-in sheet can be imaged, but the personal information must be blocked out.

Sign-in sheets for RAB meetings become part of the administrative record. The names of the RAB members, but not their home addresses, phone numbers, or e-mail addresses may be included in the administrative record. The team recommends placing a disclaimer on the RAB sign-in sheet. RAB members should be notified at the outset that disclosure of any information besides their names is not required and if given, is subject to release. The RAB members can provide their own addresses and phone numbers on the sign-in sheets, but they must be placed on notice that providing names on sign-in sheets will result in public disclosure.

Some RAB members may want their names and addresses to become part of the administrative record, since they are community representatives and may want to act as a conduit for keeping community members informed.

CONFIDENTIAL DOCUMENTS

The non-confidential part of the ARF will be scanned; a slip sheet will be entered into the ARF explaining why the confidential part is not there. The entire document, confidential and non-confidential, can be placed in a confidential ARF at the EFD/EFA. The team recommends filing the document in one location, although the Office of Solid Waste and Emergency Response (OSWER) memorandum recommends storing confidential and non-confidential parts of the document separately. Separating the document increases the possibility of loss.

DOCUMENTS WITHOUT DATES

The suggested way to research is by date. If there is no date, use "today's date." A default date can be used; the team recommends default to first day of month; if only month and year are showing. If the signature has a date, use that date. If no day, use 01.

POTENTIALLY RESPONSIBLE PARTY (PRP)

If there is a PRP involved, the team recommends counsel and project manager review to determine if the document belongs in the ARF. This needs to be done on a case by case basis.

LABORATORY DATA

The validated lab data is required to be part of the AR (logged/inventoried in the database along with the rest of the records), but it is not required to be physically located (or filed) with the ARF because of the large volume. It is recommended that this data not be scanned.

HISTORICAL DOCUMENTS

Historical documents usually give information about the base or a particular site which is useful in determining what happened to the site in the past. It helps the project manager get a good idea of what he or she is up against regarding possible contaminants. Usually, this type of information, unless it is archaeological, doesn't need to be protected. It can be added to the ARF if it is pertinent to the history of an IR site.

DOCUMENTS WITHOUT SIGNATURES

Original documents with original signatures are usually difficult to obtain, especially when they are older ones. The team recommends using the original when it is available. Replace a copy of a document with an original when possible and practical (some old documents are onion skin). If nothing else is available, a good copy (or even a bad one) will do for the ARF. Everyone's ARF has copies of documents without signatures. The team recommends making every effort to get a copy with a signature, no matter whether it's the original or not.

SAMPLE CHECK LIST TRANSMITTAL/DELIVERABLE RECEIPT FORM

This check list is for the contractor and the customer to use to ensure that all deliverables have been received that may pertain to the ARF.

Contractor Name:			
Contract Number:			
Contractor Document Control N	umber:		
Contractor File Code:			
EEA (EED M			
EFA/EFD Name:			
Address:			
POC, Code:			
City, State, Zip:			
Date of form:			
CTO #:			
Location:			
Location.			
From: Name of Contractor Prog	ram Manager		
Description: Brief Description of			
Type: Contract Deliverable		erable Change N	Notice/Project Note
Other			
Version: (draft, draft final, final,	etc) Revision Numb	er:	
ADMIN RECORD: Yes	No	Category	Confidential
(PM to identify)			
Scheduled Delivery Date:	Actual I	Delivery Date	
Number of copies submitted:	<u>OE/6C/6E</u>		
Copies to: (Include Name, Navy	Mail Code and num	ber of copies)	
DED/EE A		0.1	
		Other: (Distribution do	ne by Contractor XYZ)
	Doe, ENV, (1C/1E)		
· · · · · · · · · · · · · · · · · · ·	Smith (1C/1E)		
	Jones (1C/1E)		
M. Smith, Code 67 (2C/2E)			
O = Original Transmittal Sheet			
C = Copy Transmittal Sheet			
E = Enclosure			
L LIICIOSUIC			

STEP TWO - QUALITY ASSURANCE/QUALITY CONTROL

Purpose

The purpose of this guidance is to ensure that the CERCLA Administrative Record is maintained consistently to improve and maintain the integrity of the database and develop a complete electronic copy of all records inventoried.

A. PRE-INDEXING QA/QC REVIEW

The following procedures are to be performed prior to entering the records into the EFD/EFA Environmental Records Database:

- 1. Verify the record is dated and signed. Verify that records issued by a contractor contain a Document Control Number (DCN). In cases where the record is a draft, the accompanying signed transmittal letter is considered to be the signature. When in doubt, consult the RPM.
- 2. Verify that the Table of Contents accurately reflects the actual content of the record and the page numbers identified correspond to the appropriate pages.
- 3. Ensure that all pages are contained within each record. Every effort shall be made to locate any missing pages, sections, appendices, tables, figures, attachments, enclosures, etc. Ensure that all pages are in the correct order. If not, place in the correct order. Special attention should be given to analytical data as it may be difficult to determine the correct order of pages. When in doubt, consult the RPM.
- 4. Occasionally, attachments or enclosures may have been previously entered into the database as a separate record. Verify that the section in question has been entered into the database. If so, place a slip-sheet (Attachment A) to indicate that the attachment or enclosure has been entered into the database under a separate record number and identify the record number
- 5. For missing items from records produced by the contractors or any sub-contractor, forward an e-mail to the Contracting Officer Representative's (COR) management assistant requesting the missing items from their copy or from the issuing contractor.

Items to provide the COR when requesting missing items:

- (a) Contract Number or Contractor Name
- (b) CTO or DO Number
- (c) Contractor's Document Control Number
- (d) Record Title
- (e) Record Date
- (f) List of Missing Items from the Record
- (g) Administrative Record Number

- (h) Provide Copy of the E-Mail to the Administrative Record RPM
- 6. Some records will contain multiple volumes. Verify that all volumes have been received. All volumes are to be entered under **one record number, as one record** (records previously entered into the EFD/EFA Environmental Records Database will NOT be renumbered). Indicate the volume number and the total number of volumes which complete the record (i.e., Volume I of II; Volume II of II, etc.). If records with multiple volumes were entered into the database separately with each volume labeled with its own distinct record number, place a slip-sheet (Attachment A) to indicate that the volumes have been entered in the database under a separate record number and identify the record number.
- 7. Remove blank pages **ONLY**. **DO NOT** remove pages marked with notations such as "This Page Intentionally Left Blank", page numbers, etc. When in doubt, consult the RPM.
- 8. **DO NOT REMOVE TAB SHEETS**. For imaging purposes, ensure the page following the tab appropriately identifies appendices, figures, tables, attachments, enclosures, etc. If not adequately identified, insert a slip-sheet (Attachment B) identifying the appropriate information to be used during imaging.
- 9. Ensure that all pages actually belong to the record being reviewed. If not, tag the pages in question and verify with the RPM. For records issued by companies, this is verified by the header of each page which identifies the contractor's Document Control Number (DCN). For other records, consult the RPM when in doubt.
- 10. In some cases, pages with maps, figures, tables, etc. are not numbered and one or two consecutive page numbers have been skipped. Place the next appropriate page number on the affected page(s) and place a slip-sheet (Attachment C) identifying the next page number that was skipped. This will inform the reader that pages were intentionally left blank. ALWAYS verify page numbers with the Table of Contents.
- 11. For pages that will be scanned "grey/scale," tag the pages with a Post-It™ marked with "G/S". Place the tag on the right edge of the page so that when the record is placed into the file folder it will be visible during the scanning process.
- 12. When records received contain diskettes, verify that the diskette is readable. Place a completed slip-sheet (Attachment D) in front of the diskette within the record. Consult the RPM when the diskette is not readable.
- 13. Oversized maps are usually placed in plastic slipcovers. After a period of time the print from the map adheres to the plastic. To maintain the integrity of the printed map, remove the map from the plastic cover and place it into a heavy stock paper slant cut folder.
- 14. Some pages within a record require special handling (i.e., crinkled, ripped, extra hole punches, etc.), tag the pages with a Post-It™ marked with a "**RED**" slash. Place the tag

on the right edge of the page so that when the record is placed into the file folder it will be visible during the scanning process.

- 15. Attachment E is provided as a transmittal for the COR's management assistant when returning records with discrepancies to the issuing agency or company. Provide all required information described in Item A.5 above.
- 16. Attachments F, G and H are examples of possible discrepancies that may occur. These attachments may be used, on a limited basis, in cases where records require notations of unusual circumstances. Consult the RPM prior to their use.
- 17. Ensure that when using any of the attached slip-sheets, "ATTACHMENT X" located at the top right corner of the page MUST be removed prior to inserting into any record.
- 18. When all discrepancies have been corrected or exceptions noted with slip-sheets, prepare the record for data entry. Enter the record into the Environmental Records Database following previous guidelines.
- 19. Remove all records from 3-ring binders. Remove any spiral combs, paper clips, staples, etc. from each record. Forward re-usable binders to the EFD/EFA Supply drop-off. For records approximately 1 inch thick or more, bind with the fasteners provided by the respective EFD/EFA.
- 20. Label the record with the appropriate Administrative Record Number (assigned from the EFD/EFA Environmental Records Database). Place a 1" x ½" label at the top right corner on the first page of the record; ½" from the right edge and ½" from the top edge of the page. Place the record into the smallest folder that will accommodate the record. Label the file folder with the same information as the record. Place a 1" x 2" label at the top left corner of the file folder. The records shall be placed into the folder spine side down so that the record label appears below the file folder label. File the record in the correct activity location, in numerical record number order, on the shelf.

The information shown below shall be placed on both the record and file folder labels:

SAMPLE LABEL

UIC NUMBER.RECORD NUMBER ACTIVITY NAME SSIC NUMBER N12345.001334 NAS Anywhere SSIC # 5090.3

B. PROCESSING PRIVILEGED RECORDS

- 1. The pre-indexing procedures outlined in Item A above also apply to privileged records.
- 2. Privileged records shall be marked as "CONFIDENTIAL". The confidential markings will be determined based on whether the record is fully or partially privileged. When in doubt as to whether or not a record is considered confidential, consult the RPM. EACH RECORD WILL BE FILED INTACT WHETHER FULLY OR PARTIALLY CONFIDENTIAL. PARTIALLY CONFIDENTIAL RECORDS WILL NOT BE BROKEN APART AND FILED SEPARATELY.
 - (a) For records determined to be fully confidential, stamp the top and bottom margins of the first and last pages of the record "CONFIDENTIAL" using the red self-inking stamp provided by the EFD/EFA. The folder will also be stamped "CONFIDENTIAL" in the middle of the tab to the right of the folder label. Place a slip-sheet (Attachment I-1) as the first page of the record. Bind and label as described in Items A.19 and A.20 above. The record will be filed in a secured location in the Environmental Records Library separate from all other CERCLA Administrative Records. THESE RECORDS WILL NOT BE IMAGED.
 - (b) For records determined to partially confidential, stamp **ONLY** the top and bottom margins of the applicable page(s) or section(s) "CONFIDENTIAL" using the red self-inking stamp provided by the EFD/EFA. Insert a slip-sheet (Attachment I-2) as the first page of the record <u>AND</u> in front of <u>each</u> confidential page(s) or section(s) within the record. Bind, label, and file the record as described in Item B.2.(a) above. The record will be filed in a secured location in the Environmental Records Library separate from all other CERCLA Administrative Records. **ONLY THE PORTIONS DETERMINED TO BE CONFIDENTIAL WILL NOT BE IMAGED.**
 - (1) Prior to imaging, partially confidential records will be copied. The confidential information will be redacted. The redacted records will be **RECOPIED** to ensure confidential information cannot be read through white out or black marker. The pages or sections with the original redaction (containing the white out or black marker) will be shredded; the remainder will be recycled. The original record will be refiled in the secured location in the Environmental Records Library. The original record **WILL NOT** be transmitted for imaging.
 - (2) Upon return of the imaged record, the version sent to imaging will be transferred to the commercial storage facility as described in Item D.6 below.
- 3. Records or portions of records may have been marked privileged prior to receipt in the EFD/EFA Environmental Records Library. Check with the RPM to determine if the record or that portion of the record remains privileged. If no longer privileged, place a slip-sheet (Attachment J) with the record.

4. If the record or a portion of the record remains privileged, follow the guidance described in Items B.2.(a), B.2.(b)(1) or (2) above.

C. PRE-IMAGING PROCESSING (INCLUDES MICROFILM, MICROFICHE AND CD-ROM)

- 1. Print a complete index from the EFD/EFA Environmental Records Database, sorted by record number, for the base to be imaged. Verify that all records listed have been reviewed as described in Item A above.
- Verify that all records identified on the index are on file. Retrieve any documents that
 have been checked out of the Environmental Library and locate any missing records.
 Records MUST be forwarded for imaging in sequential record number order. Consult
 RPM when records cannot be located.
- 3. If the procedures outlined in Item A, above, have not completed, they MUST be performed prior to forwarding for imaging.
- 4. Place all QA/QC'd records into standard white Federal Records Center (FRC) approved boxes. Place file folders into boxes with folder labels facing the front of the box (the front is marked with "ACCESSION NUMBER"). The records shall be placed in the boxes in record number order. Records MUST be processed in sequential order. Consult RPM if missing records are identified.
- 5. Complete the Record Imaging Transmittal (Attachment K) and prepare a Record Imaging Transmittal cover letter (Attachment L). Provide to the RPM for signature with the original transmittal sheet. Distribute the letter and transmittal sheet as follows:
 - a. Originals to the addressee (Fax advance copy of the letter **ONLY** to addressee)
 - b. One copy to RPM's file
- 6. Flag records in database (Image Status field) indicating they have been forwarded for imaging.
- 7. Seal and label the boxes. Label each box as shown below:
 - a. For boxes retrieved from the commercial storage facility, use the following label:

SAMPLE LABEL

BOX NUMBER ACTIVITY NAME RECORD NUMBERS 37041349 NAS ANYWHERE N12345.000001 – 000030

b. For records boxed from the EFD/EFA Environmental Library, use the date the records are being transferred, followed by the volume number of each box. For

example, 3 boxes of records transferred on 20 August 1999 would be numbered 990820-1/3; 990820-2/3; and 990820-3/3. Label each box as shown below:

SAMPLE LABEL

BOX NUMBER ACTIVITY NAME RECORD NUMBERS 990820-1/3 NAS ANYWHERE N12345.000198 – 000220

D. POST-IMAGING PROCESSING (INCLUDES MICROFILM, MICROFICHE AND CD-ROM)

- 1. Upon return of the imaged records, verify that all records forwarded for imaging are contained in each box and remain in sequential order.
- 2. Remove any Post-It[™] tags previously applied for imaging and discard.
- 3. Verify each CD-ROM is usable.
- 4. Verify that all functions and features on the CD-ROM are operational (including, but not limited to, Table of Contents hot links, search functions, query builders, report printing, page marking, unmarking and printing, etc.).
- 5. Verify that all records and pages to each record are contained on the CD-ROM. A sampling of records, consistent with any error rates noted, shall be reviewed. Attention shall be given to record types that are typically voluminous in order to verify page order, image quality of maps, drawings, etc., and proper links applied from the Table of Contents.
- 6. For boxes retrieved from the commercial storage facility, prepare the commercial storage facility Fax Order Form for new shipments, retrieval and re-file (Attachment M) and provide to RPM for processing. For records boxed from the Environmental Records Library, label boxes with commercial storage facility's bar code labels. Prepare commercial storage facility Records Transmittal Form (Attachment N) and provide to RPM for processing. **DO NOT SEND RECORDS TO COMMERCIAL STORAGE PRIOR TO COMPLETING QA/QC ON THE CD-ROM.**
- 7. Flag the records in the database by clicking the "Imaged?" field and entering the commercial storage facility's box number into the "Box Number" field.
- 8. Note all discrepancies (includes missing pages, poor image, linking to incorrect pages, incorrect page sequence, etc., and the elements identified in Item C.5 above). For records where pages or sections are missing from the CD-ROM, note the CD-ROM page numbers before and after the missing page should appear. Tag the pages of the paper record with a Post-It™ marked with the CD-ROM page number. Place the tag on the

right edge of the page so that when the record is placed into the file folder it will be visible during the scanning process.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT A

N12345.001383 NAS ANYWHERE SSIC # 5090.3

ENCLOSURE

TITLE

DATED 30 AUGUST 1997

THE RECORD THAT OCCUPIES THIS POSITION IN THE CERCLA ADMINISTRATIVE RECORD IS FILED WITH

AR # N12345.001120

TITLE

DATED 12 JULY 1996

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REOUIREMENTS.

ATTACHMENT B

N12345.001383 NAS ANYWHERE SSIC # 5090.3

APPENDIX

TITLE

DATED 30 AUGUST 1997

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT C

N12345.001383 NAS ANYWHERE SSIC # 5090.3

PAGE NO. 4-7

THIS PAGE WAS INTENTIONALLY LEFT BLANK

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT D

N12345.001383 NAS ANYWHERE SSIC # 5090.3

DISKETTE VERIFICATION FORM

PAGE NO. PRECEEDING DISK:		
INDICATE WHETHER DISK IS LOCATED IN APPENDIX ATTACHMENT, ENCLOSURE, ETC.	(,	
DISK WAS READABLE (YES OR NO):		
DISK FORMAT:		

PLACE THIS FORM IN FRONT OF DISK

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT E

N12345.001383 NAS ANYWHERE SSIC # 5090.3

RECORD DISCREPANCY FORM

 RECORD REQUIRES SMALL LABEL
 FOLDER REQUIRES LARGE LABEL
 PAGE(S) MISSING:
 ENCLOSURE(S) MISSING:
REQUIRES SLIP-SHEET(S) AS FOLLOWS:

ATTACH THIS FORM TO THE RECORD

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT F

N12345.001383 NAS ANYWHERE SSIC # 5090.3

ATTACHMENT/APPENDIX/ENCLOSURE, ETC., IS CONTAINED ON A DISKETTE AND IS TOO VOLUMINOUS TO PRINT.

FOR A COPY OF THE DISKETTE, CONTACT:

Insert Name
Title
EFD/EFA
Address
City, State, Zip

Telephone

E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT G

N12345.001383 NAS ANYWHERE SSIC # 5090.3

IDENTIFY SECTION/ATTACHMENT/APPENDIX/ENCLOSURE/ETC. NUMBER(S) AND TITLE

The page/section(s)/attachment/appendix /enclosure/etc. which occupies this space is not available.

Extensive research was performed by (Insert EFD/EFA) to locate this page/ section(s)/ attachment/ appendix/enclosure. This page has been inserted as a placeholder and will be replaced should the missing item be located.

Questions may be directed to:

Name
Title
EFD/EFA
Address
City, State ZIP
Telephone
E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT H

N12345.001383 NAS ANYWHERE SSIC # 5090.3

SAMPLING AND ANALYSIS DATA

THE RECORD THAT OCCUPIES THIS POSITION IN THE CERCLA ADMINISTRATIVE RECORD IS NOT REQUIRED TO BE AT OR NEAR THE ACTIVITY.

TO VIEW THE RECORD, CONTACT:

Name
Title
EFD/EFA
Address
City, State ZIP
Telephone
E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT I-1

N12345.001383 NAS ANYWHERE SSIC # 5090.3

PRIVILEGED RECORD

THE RECORD THAT OCCUPIES THIS POSITION IS DETERMINED TO BE CONFIDENTIAL IN ITS ENTIRETY AND IS NOT FOR PUBLIC VIEWING.

QUESTIONS MAY BE DIRECTED TO:

Name
Title
EFD/EFA
Address
City, State Zip
Telephone
E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT I-2

N12345.001383 NAS ANYWHERE SSIC # 5090.3

PRIVILEGED RECORD

PORTIONS OF THE RECORD THAT OCCUPIES THIS POSITION ARE DETERMINED TO BE CONFIDENTIAL AND ARE NOT FOR PUBLIC VIEWING.

INDICATE TYPE OF INFORMATION BEING WITHHELD (I.E., NAMES AND ADDRESSES OF PRIVATE CITIZENS HAVE BEEN REDACTED)

QUESTIONS MAY BE DIRECTED TO:

Name
Title
EFD/EFA
Address
City, State Zip
Telephone
E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT J

N12345.001383 NAS ANYWHERE SSIC # 5090.3

THE RECORD THAT OCCUPIES THIS POSITION IS NO LONGER CONSIDERED CONFIDENTIAL

OR

PORTION(S) OF THE RECORD THAT OCCUPIES THIS POSITION IS NO LONGER CONSIDERED CONFIDENTIAL

QUESTIONS MAY BE DIRECTED TO:

Name
Title
EFD/EFA
Address
City, State Zip
Telephone
E-mail

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT K

RECORD IMAGING TRANSMITTAL									
ACTIVITY:		DATE:		PAGE of					
FROM:	7	го:		CC:					
SUBJECT: CERC		ative Record Docu N12345-92-D-000		ted for Imaging					
BARCODE BOX NO.	EFD/EFA BOX NO.	RECORD NUMBER	BARCODE BOX NO.	EFD/EFA BOX NO.	RECORD NUMBER				

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT L

N12345.001383 NAS ANYWHERE SSIC # 5090.3

RECORD IMAGING TRANSMITTAL COVER LETTER

Serial number Code Date

-	_	_	_	_	_	_	_	_
Λ	D	ı٦	ப	_	C,	c,	ᆫ	ᆫ
\boldsymbol{H}	. ,	.,	т	_	. ¬	. ¬	_	_

Subj: Transfer of NAS Anywhere CERCLA Administrative Records for Imaging

Encl: Document Transmittal Sheet for Box Numbers 990708-1/3; 990708-2/3;

990708-3/3; and 24222957

There are four boxes of the subject documents ready for imaging. The documents have been reviewed and determined to be complete and accurate for imaging under Contract No. N12345-92-D-0001, CTO _____.

Please let me know when you are available to receive the boxes.

Sincerely,

NAME TITLE

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT M

N12345.001383 NAS ANYWHERE SSIC # 5090.3

COMMERCIAL STORAGE FACILITY FAX ORDER FORM FOR NEW SHIPMENT, RETRIEVAL, AND RE-FILE

(If the EFD/EFA is using a commercial storage facility, it is recommended that the EFD/EFA use the form provided by the contractor.)

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

ATTACHMENT N

N12345.001383 NAS ANYWHERE SSIC # 5090.3

COMMERCIAL STORAGE FACILITY RECORDS TRANSMITTAL SHEET (MUST ACCOMPANY NEW SHIPMENTS ONLY)

(If the EFD/EFA is using a commercial storage facility, it is recommended that the EFD/EFA use the fax form provided by the contractor.)

CONTRACTOR QA/QC PROCEDURES*

Written procedures should be followed to prevent loss of documents and to ensure security of all documents while in the subcontractor's possession. All boxes (containers) should be clearly identified with the client's name, project name, and an identifying sequential letter or number. While in the subcontractor's possession, all documents are held in a locked storage area. Only authorized personnel have access to this area. Documents are removed from locked storage only as needed and returned immediately after use.

During the archiving process, the required box is removed from the locked storage area. In each phase of the process, all documents are returned immediately after use to the box (container) in their original order. The box is returned to locked storage until it is needed for the next phase of the archiving process. Keeping all documents in their original order, in their original box (container), and in locked storage while not in use prevents loss of documents and ensures the security of all documents.

*Used by permission, Standard Operating Procedures, Multimedia Unlimited Inc., Park West One, Suite 140, Pittsburgh, PA 15275.

STEP THREE - INDEXING

Purpose

Appendix D has been adopted to be the Core and Optional fields that are pertinent to indexing the AR for accuracy and linking to other databases.

Index each record in accordance with Appendix D and Reference 2. Creating the index allows users to search or query the indexed information using the software package employed to create the database.

The following procedures are recommended when creating an index:

- Use Commercial Off-the-Shelf Software (COTS).
- Create an index (database) using Appendix D.
- Index each record with consistency. Develop standard naming conventions for data entry. Use pull down menus to ensure consistency.
- Place the document record number on the first page of each physical record as appropriate. Recommend marking or labeling first page of each record in the upper right-hand corner.
- Design the database to assign a unique sequential number for each record.
- Recommend using Unit Identification Code (UIC) plus unique sequential record number to create a master field.
- Recommend filing paper ARF by computer generated sequential record number.
- Recommend adding a field for the contractor internal document control number to the indexing database. It is useful when the contractor is asked to do a search for documents they generated that you may be missing.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

Suggested Labeling (videos and floppy discs require labeling also):

• Folder Label Size: User's choice, Font Size: 14 or 16

• Document Label Size: User's choice, Font Size: 14 or 16

• Information on each label

• For CERCLA: For Compliance:

• UIC Seq. Number Compliance UIC # Seq. #

• Activity Name Activity Name

• SSIC# 5090.3 SSIC# 5090.4

CERCLA Example: Compliance Example: N12345.000324 Compl.N12345.000324

Activity name SSIC# 5090.3 SSIC# 5090.4

Label Number Prefix Key:

AR is indicated by UIC Compliance is indicated by Coml UIC Tech. Library is indicated by TL Compendium is indicated by CMPDM Misc. is indicated by Misc.

STEP FOUR - SURVEYING THE CUSTOMERS

Purpose

Before committing to a designated media for customers, it is recommended that a survey of customers be conducted to determine their electronic capability.

- Surveying the customers may include but not be limited to repositories, Base Environmental Office, federal and state regulatory agencies, and in-house users.
- After completion of survey, determine the number of copies needed in appropriate media.
- A list of questions to ask during the telephone call follows.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

CERCLA ADMINISTRATIVE RECORD MANAGEMENT SYSTEM USER'S GUIDE SURVEY

PUBLIC ORGANIZATION/LIBRARY SURVEY TO DETERMINE HARDWARE AND SOFTWARE NEEDS

- 1. Call the organization/library which is targeted to house the Administrative Record File OR is currently housing a paper copy of the ARF.
 - Preliminary work will include organization name/address/telephone number of appropriate administrator
 - Identify yourself/organization
 - Clarify the purpose and intent of the ARF and the reason it must be available to the public
 - The ARF and Index is the collection of documents by the Department of the Navy (DON) in the selection of environmental response actions for the Installation Restoration Program currently underway.
 - The ARF serves two purposes. First, it provides access to site-specific information so that the public may make informed comments to the DON on the selection of response actions. Second, if the adequacy of a response decision is challenged in court, the judicial review of that decision may be largely based on the records in the ARF.
 - Explain the purpose of the phone call
 - to explore the possibility of housing the ARF at their site in an electronic format **OR**
 - to explore the possibility of changing the ARF existing storage medium
- 2. The following questions are based on initial responses from the appropriate administrator.
 - If the response to questions one and two is positive, then proceed through the "if then" scenarios below.
 - If the initial response is negative and they are not willing to house the record electronically, then an alternate plan will need to be implemented.

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

- 3. QUESTIONS TO POSE
 - Are you willing to house the Administrative Record in electronic format?
 - Specify the designated format
 - Web based program
 - Dedicated server
 - CD-ROM
 - Microfilm
 - Microfiche
 - Other
 - Do you currently have space and equipment available to house and use the ARF in the specified format?
- If the answer is YES. They have both space and equipment and are willing to house the Administrative Record in the specified format THEN:
 - Ask for a point of contact who can answer technical hardware and software questions
 - Contact technical representative discuss and coordinate:
 - Technical information/requirements
 - Installation
 - Housing
 - Updates
 - Navy technical support (not recommended)
 - Ask for a written policy for computer guidelines (electronic resources guidelines)
 - Ask for a written policy for monitoring computer usage
 - Keep both policies in your official files
- If the answer is both YES and NO. They have space but inadequate equipment and are willing to house the Administrative Record in the specified format THEN:
 - Ask, in order to use the specified format, what they need to accommodate the request:
 - hardware/equipment/furniture
 - software
 - internet connection (paid for; possibly for one year)

PLEASE NOTE: SAMPLES CAN BE TAILORED BY EACH USER TO SUIT COMMAND REQUIREMENTS.

- Ask if they would they be willing to **accept and maintain** hardware/equipment/software purchased for their use?
 - If the answer is YES, THEN:
 - Ask for a point of contact who can answer technical hardware and software questions
 - Contact technical representative discuss and coordinate:
 - Technical information/requirements
 - Installation
 - Housing
 - Updates
 - Navy technical support (not recommended)
- If the answers are both NO. Then provide the Library with appropriate alternate format (i.e., paper)

COMPUTER EQUIPMENT PURCHASE FOR PUBLIC REPOSITORIES

The decision to purchase computers should be based on the following:

- A good business decision based on considered customer needs
- The computer is an integral component of the web based administrative file
- Size of the paper administrative record file
- Library location and resources (staff and space)
- Public relations
- Meeting legal requirements for the administrative record file

The following controls on the computer are recommended:

- Computer startup to the administrative record file web site
- Password controlled access by library staff
- Add line item in library electronic resources guideline that the computer was provided by the U.S. Navy to allow public access to the administrative record file and must be used according to library guidelines
- Post a label/note on or nearby the computer to the same effect as above
- Have instructions for accessing and navigating the administrative record file
- Post the activity web site address so patrons can access it from home

STEP FIVE - DISTRIBUTION

Purpose

Document, maintain and distribute the ARF.

- Refer to Step Three to determine number of copies and type of media. Distribution should be accomplished by EFD/EFA. Recommended distribution of **paper copies**:
 - Original copy retained by EFD/EFA
 - Activity Environmental Office
 - Public Repository
 - EFD/EFA RPM (optional)
- Distribution for electronic format (CD-ROM) may include, but is not limited to:
 - EFD/EFA (RPM and Administrative Records Coordinator)
 - Activity Environmental Office
 - Public Repository
 - Federal Environmental Agencies
 - State Environmental Agencies
 - NFESC
 - Master original and one copy retained by contractor
- Distribute by preferred method.

STEP SIX - UPDATING THE ARF

Purpose

Provisions should be made to ensure regularly scheduled updates.

- Updates should be done on a regularly scheduled basis. No more than one year should pass between updates.
- Steps one through five apply to updates.
- The updated database may be contained on the new electronic media.
- Records not included in the original electronic conversion should be included in the next scheduled update. If a record is out of order, add a disclaimer statement to the electronic format.
- For multiple CDs, consider putting the index on a separate CD or downloading it to the hard drive.
- Recycle CDs appropriately.
- Label updates appropriately.

Migration of Data and Media

Hardware, software and technological changes occur at an ever-increasing pace. The need is to ensure that the data will be able to be read forever using the equipment in the office. The life span of the media and the version of the software will need to be monitored. It is **critical** that the ARF conversion schedule includes time for either re-burning the CDs, and/or moving the data from one media or software version to another.

CD-ROM Life Span

There appears to be conflicting data on the life span of CDs. It is recommended that you re-burn CDs every seven to ten years. A web site to view for information regarding life span is:

http://www.cd-info.com/CDIC/Technology/CD-R/Media/Longevity.html

There are companies available who have old equipment and software that can transfer your information from one media and/or software version to another. For a fee, they will migrate your data. The National Archives and Records Administration (NARA) has old equipment; for example, old magnetic card reading equipment.

Other companies can be located on the web by searching for data migration, data conversion, and backfile conversion.

CHAPTER IV

FILING/STORING THE ARF

The paper ARF can be filed/stored by EPA category code or by computer-generated record number. Using the EPA category code to file/store the paper ARF creates an ongoing need to shift paper files. Filing/storing the documents by the computer-generated number will eliminate the need to shift paper to make room for new documents.

CHAPTER V

SUPPORT CONTRACT QUALIFICATIONS

CRITERIA FOR SELECTING A CONTRACTOR

- Select a contractor who can integrate the software that you select, who can meet your requirements, and who will adhere to the customer's needs.
- Ensure contractor has security provisions in place. While records are in contractor possession, ensure they are protected from unauthorized access and use.
- Have contractor provide QA/QC Program Guide. See page 46 for an example.
- Recommend selecting a contractor within EFD/EFA geographical area.
- Ensure customer has accessibility to records at all times.
- Determine if contractor has extensive experience in systems integration and imaging.
 - Request an evaluation copy of their software.
- Assess contractor's equipment to ensure that it is state of the art.
- Tour the contracting facility.
- Evaluate contractor personnel for experience and expertise.
- Have contractor provide references.
 - Check references for support capability and services.
- Make sure the contractor uses the ISO 9660 Standards for CDs. The standards were updated in 1999.

ISO 9660:1999 http://www.y-adagio.com/public/standards/iso_cdrom/tocont.htm

Please refer to the DOD Automated Document Conversion Master Plan (Automated Document Conversion Plan April 1995 (Word) http://www.c3i.osd.mil/other/adc/adcrpt.doc

Automated Document Conversion Plan April 1995 (html) http://www.c3i.osd.mil/other/adc/adcrpt.html

for "CD-ROM standards:
 ISO 10149:1989, Information Processing – Data Interchange on Read-Only 120 mm Optical Data Disks (CD-ROM), standardizes the physical

characteristics (track shape, track pitch and data structure) on a Compact Disc."

EXPLANATION OF THE SCOPE OF WORK

The following is a SAMPLE Scope of Work for converting a paper ARF from paper to an electronic format. The scope is aimed at the initial conversion of paper to electronic format. When a command decides to convert paper ARFs to an electronic format, the initial conversion usually involves an enormous amount of paper documents. Paper predominates because most of the documents are older and were not created in an electronic format. If they were originally created as electronic documents, the electronic file no longer exists.

The scope of work begins with the presumption that paper documents/records to be scanned have been researched and selected for inclusion in the ARF.

The scope of work was written as a series of pick lists. Requirements for the web and CD-ROMs are listed. The list is as comprehensive as experience can make it. Readers should review the pick lists, determine customer needs, and select options which best fit requirements.

Scanning requirements are basic. The selected format for scanning is Portable Document File Format (.pdf). It was chosen because it is the accepted format for electronic Federal government documents. By using .pdf format, the documents can be searched, opened and read by most users. A .pdf is a free (although proprietary) universal format. It can be used for both the web or CD-ROMs.

Other scanning requirements (some are self explanatory, others have explanations) should be included when writing the scope. Optical Character Read (OCR) is not a requirement but is strongly recommended. OCR creates an additional information search capability to include nearly every word in every document. OCR will add cost to the conversion.

Web requirements and CD-ROM requirements are pick lists. Usually, one format is selected, however, many commands have chosen to put an ARF on a web site and create CD-ROMs. Individual military installation needs normally dictate the format for the ARF.

Certain **files** need to be provided. They can either be provided by the Navy or the contractor performing the work for the Navy.

Database requirements/Search screens/Search screen results is a pick list. Search screens and search screen results should be tailored to fit individual needs. The screens were based on typical web search engine screens and web search engine "search results" screens.

The Administrative Data Entry Screen is a starting point for creating searchable data fields. Please incorporate core and optional fields (see Appendix D). By using "pull-down menus" wherever possible, standard naming conventions promote consistency of data entry. This results in more accurate and complete data returned to the customer from the search request. Please note that data entry can be done directly into Microsoft Access if there is no "need" to create a data entry screen.

Project milestones for CD-ROM and web based product and the number of copies are suggestions. The schedule and number of copies can be modified to suit customer needs.

DEVELOPING A SCOPE OF WORK FOR THE ADMINISTRATIVE RECORD FILE (ARF)

SCOPE OF WORK

- Search the entire database using OCR with .pdf format
- Capture the ARF documents as images, and link them to an electronic database/index.

Scanning Requirements

- Scan paper archival documents. Approximately ____ pages will be scanned as .pdf file
 - ♦ Approximately ____ oversize figures (larger than 11" x 17") will also be scanned as .pdf files at a reduced scale
- Conversion of native electronic files to .pdf and appropriately incorporated
 - Files ranked for cost, time and space requirements
 - □ black and white image
 - □ gray scale image
 - color image
- Scan black & white images, gray scale images, drawings, text at 300 dpi
- Documents and figures with color enhancements will be reproduced as color images
 - .pdf files will be hyperlinked to a Microsoft Access database/index
 - ♦ Individual document table of contents (sections, tables, figures, graphics) will be bookmarked to the appropriate section within the document
 - □ Bookmarks show in the left window margin
 - □ Each bookmark in the navigation pane goes to a different view or page within the document
 - □ Hierarchial by subject heading The cost for creating bookmarks and hyperlinks is approximately equivalent on a per link/bookmark basis since both are created using Acrobat® Distiller® software. While the keystrokes and mouse clicks used to create hyperlinks are different than bookmarks, the total time spent creating them is approximately the same. Most scanning contractors charge an hourly fee for creating bookmarks and hyperlinks, so the cost (and to some degree the unit cost) will vary according to the total number of links/bookmarks required per document.
 - ◆ Documents will be Optical Character Read (OCR)
 - □ Built into Adobe® Acrobat® authoring software
 - □ Certain fonts are easier to scan and convert to OCR. Arial 11 works best.
 - Scanning quality assurance/quality control will include the following:
 - ensure document integrity when documents are under contractor control
 - contractor records validation upon their receipt and return
 - ensure photo, drawings, images (black/white and color) clarity
 - ensure proper page alignment
 - ensure search and access capabilities are fully functional as requested

Web Requirements

- Information will be displayed consistently throughout the program
 - Graphics will be consistent with the graphics on existing web site (use as appropriate)
 - Other designs, wallpaper, fonts and use of color will be aesthetically pleasing and properly used
 - An appropriate identifier (i.e., "Insert Activity Name Administrative Record File") using the proper name of the customer and their logo (as directed) will be incorporated into a graphic banner and will appear on each screen of the Administrative Record File
 - ♦ Other appropriate information
 - set up an e-mail point of contact for technical trouble
 - set up an e-mail point of contact for inquiries, comments, etc., with appropriate telephone number(s) (as directed)
 - official mailing address for point of contact
 - ♦ "Hits" counter
 - Serve images up as byte servings
 - ♦ Limit file size to 15M
 - ♦ Button access to password protected area for document review
 - ♦ Button access to a "what's new" page
- Button access to documents which explain and supplement the Administrative Record File
 - ◆ Definition and purpose of the Administrative Record File
 - ◆ U.S. EPA Category Code explanation
 - ♦ Installation Restoration acronyms
 - ♦ Bibliography of documents which create and grant authority for the establishment of the Administrative Record File
 - Proper file names to be supplied by the Navy
 - □ File format will be consistent with policy
 - ♦ Capability to search and view CAD files
 - Capability for voice recognition for review and navigation features
- Capability for standard searching (see below) across document contents
 - □ searching not "case sensitive"
 - capability for wild card searching
 - ♦ Standard search results viewing (see below)
 - Deliver search results as ranked and relevant
 - ♦ Linking to existing WEB documents as directed (example: environmental acronyms document, EPA full-text of laws)
 - Contractor logos will not appear on the final product

CD-ROM Requirements

- Information will be displayed consistently throughout the program
 - Graphics will be consistent
 - Other designs, wallpaper, fonts and use of color will be aesthetically pleasing and properly used

- ♦ An appropriate identifier (i.e., "Insert activity name Administrative Record File") using the proper name of the customer and their logo (as directed) will be incorporated into a graphic banner and will appear on each screen of the Administrative Record File
- ♦ Other appropriate information
 - set up an e-mail point of contact for technical trouble
 - set up an e-mail point of contact for inquiries, comments, etc., with appropriate telephone number(s) (as directed)
 - official mailing address for point of contact
- Button access to documents which explain and supplement the Administrative Record File
 - Definition and purpose of the Administrative Record File
 - ♦ U.S. EPA Category Code explanation
 - ♦ Installation Restoration acronyms
 - ♦ Bibliography of documents which create and grant authority for the establishment of the Administrative Record File
 - Proper file names to be supplied by the Navy
 - □ File format will be consistent with policy
 - ♦ Capability to search and view CAD files
 - Capability for standard searching (see below) across document contents
 - □ searching not "case sensitive"
 - capability for wild card searching
 - ♦ Standard search results viewing (see below)
 - Deliver search results as ranked and relevant
 - ♦ Linking to existing WEB documents as directed (example: environmental acronyms document, EPA full-text of laws)
 - Provide a quick reference guide to searching
 - ◆ Ensure that the CD is a "run-time" CD and writes minimal amounts of files to the hard drive. Recommend no more than 5M
 - Contractor logos will not appear on the final product

Disclaimer

• Recommend that this disclaimer be put on web pages displaying a copy of the ARF, or any electronic media containing a copy of the ARF (CD ROM, web page, diskettes, etc.)

◆ DISCLAIMER

The (please insert Activity Name) Administrative Record File (Please insert media -- web page, CD ROM, Diskette, microfiche, microform, etc.) information is an electronic copy of official documents and reports which comprise the Administrative Record File. The legal, paper Administrative Record File is held by the lead agency, the (Please fill in the EFD/EFA), Environmental, Naval Facilities Engineering Command.

As directed by U S EPA guidance, the Administrative Record File has been made available to the public. The (Please insert media -- web based, CD ROM, Diskette,

microfiche, microfilm, etc.) version of the Administrative Record is considered to be a copy of original documents and reports.

Please direct any questions regarding content to the point of contact on the screen.

The following files will be provided

- electronic copy of the ARF database
- electronic copy of list of acronyms
- electronic copy of definition and purpose of the Administrative Record File
- electronic copy of explanation of the EPA category codes
- electronic copy of point(s) of contact, telephone numbers, e-mail addresses, pictures and logos (for CD-ROM label and cover),

Database Requirements

- Create an appropriate data entry screen accessible and visible as an administrator function only (see below)
- Create appropriate search and search results screens (see below)
- Appropriate search capability and other features will be incorporated into the database
- Software code ownership will transfer to the Navy
- The data belongs to the Navy
- The contractor shall maintain original electronic information
 - ♦ It is not necessary to mark the electronic version of the document with the computer generated document number assigned by the indexing database.
- Use pull-down menus whenever possible to ensure standard naming conventions to promote consistent data entry

QUICK SEARCH SCREEN

FEATURES

- mimic Internet search engine screens and features
- perform quick and advanced searching
- screen buttons/box
 - a search button
 - a search box for search words input
 - ♦ an exit button
 - ♦ a resize button
 - an advanced search button
- appropriate search directions
- access the following Microsoft Access tables
 - ♦ title
 - ♦ site number
 - ♦ UST number

- ♦ site name
- ♦ keywords
- building number
- ◆ SITEID (field from NORM; possible field to use to help the search engine software retrieve data. This field formerly called REC_ID in NORM.)

QUICK SEARCH RESULTS SCREEN

FEATURES

- mimic Internet search screens and features
- search results will be displayed as a **list of titles**
 - titles will be hyperlinked to documents
- display the following
 - ♦ Returning Search Results for "_____" (words used by customer for searching; this should be a sentence rather than look like a data entry box)
 - ♦ Number of Search Results Found "
 - Message if no hits: "No documents found matching request. Search again"
 - search button ("start a new search")
 - ♦ a back button
 - ♦ a resize button
 - an exit button
 - a "refine using advanced search" button to access the Advanced Search screen feature
- ALL information fields available in the Advanced Search screen will
 - appear with the title as search results OR
 - be accessible via a "see more details" button which will display the following about the selected document in a separate detail information screen
 - □ keywords
 - document date
 - \Box site number(s)
 - □ UST number(s)
 - □ building number(s)
 - □ document type
 - □ organization (sender & recipient, no personal names)

ADVANCED SEARCH SCREEN

FEATURES

- mimic Internet search engine screens and features
- display the following:
 - ♦ a search button
 - a search box for search words input
 - ♦ a back button
 - ♦ an exit button
 - ♦ a resize button

- allow for the input of multiple search terms
- use "AND" search logic rather than "OR" search logic
- fields displayed for searching will be:
 - ♦ title
 - ♦ keywords
 - ♦ document type
 - ♦ site number
 - building number
 - ♦ UST number
 - organization (sender & recipient, no personal names)
 - ♦ date (From/To –use calendar style lookup system like Outlook)

ADVANCED SEARCH RESULTS SCREEN

FEATURES

- mimic Internet search screens and features
- display the following:
 - ◆ Advanced Search Results for "_____" (words used by customer for searching; this should be a sentence rather than look like a data entry box)
 - ◆ Number of Search Results Found " "
 - Message if no hits: "No documents found matching request. Search again"
 - "number of search results found "
 - ♦ a back button
 - ♦ a resize button
 - ♦ an exit button
 - a new advanced search button
- the advanced search results will be displayed as a list of titles
- titles will be hyperlinked to documents
- ALL information fields available in the Advanced Search screen will
 - appear with the title as search results OR
 - be accessible via a "see more details" button which will display the following about the selected document in a separate detail information screen
 - keywords
 - document date
 - \Box site number(s)
 - □ UST number(s)
 - □ building number(s)
 - □ document type
 - organization (sender & recipient, no personal names)

ADMINISTRATIVE DATA ENTRY SCREEN

• Data entry screen will be logically designed (at Navy direction) to be aesthetically pleasing as well as make data entry efficient

- The following will be searchable from this screen:
 - ♦ title
 - ♦ date
 - ♦ keywords
 - site/UST/building number
 - computer generated document number
- Data entry fields:
 - ♦ title
 - ♦ EPA category code
 - ♦ keywords (table)
 - ♦ document creation date
 - site number(s) (pull down menu)
 - ◆ UST number(s) (pull down menu)
 - building number(s) (pull down menu)
 - ♦ document type (pull down menu)
 - ♦ document location (as needed)
 - organization (sender & recipient; personal names as necessary)
 - computer assigned sequential number beginning with 00001
- Verify file naming conventions

Project Milestones for CD-ROM

Key Project Milestones	Number of Days	Interval
	from Award	
Collect/Deliver Paper Copy Record	30	30
Prepare Draft Document Scanning	40	25
Linking (and CD Transfer)		
Submit Draft Record (on CD)	40	0
EFD/A and Activity Review	50	10
Prepare Final Record (in CD)	60	10
Submit Final Record (on CD)	60	0
Deliver Updated Reports	360	15
Prepare Final Update of Record on CD	375	15
Submit final Update of Record on CD	375	0

Project Milestones for Web Based Product

Key Project Milestones	Number of Days	Interval
	from Award	
Collect/Deliver Paper Copy Record	30	30
Prepare Draft Web Site	40	25
EFD/A and Activity Review	50	10
Prepare Final Web Site	60	10
Submit Final Web Site	60	0
Update Web Site	As needed	

Tasks

- ◆ Task 1 Project Management
- ◆ Task 2 Document scanning, linking, database creation services to produce grouped,
- ♦ archived reports
- ◆ Task 3 Deliver Administrative Record File on CD-ROM or as web based product
- ◆ Task 4 Updated Administrative Record File
- Deliverables CD-ROM disks or web based program
 - ♦ Document Delivery Schedule for CD-ROMs

Document	Number of Copies
Draft Administrative Record on CD-ROM	1
Final Administrative Record on CD-ROM	9 (1 copy retained by contractor)
Draft Administrative Record Update on CD-ROM	1
Final Administrative Record Update on CD-ROM	9 (1 copy retained by contractor)

CHAPTER VI

EXPLANATION OF THE ELECTRONIC CONVERSION PROCESS

This chapter focuses on electronic files which will reside on a network (or other storage medium) and be accessed from a database.

The discussion includes:

- Conversion of documents which are not currently in electronic format
- Documents being created under evolving electronic deliverable specifications

Planning costs for converting archival documents to Adobe® Acrobat® portable document format (.pdf) are provided.

Adobe® Acrobat® software is the preferred standard for combining sections of deliverables created in multiple electronic formats into a single format (Adobe® Acrobat® .pdf files) organized like the original paper document.

Documents are normally converted from two general sources:

- native electronic files direct conversion (i.e., MS Word®, MS Excel™, Autodesk™ Autocad™, or ESRI ArcView™)
- **scanning archival paper documents** that were not produced electronically or have no readily available electronic files

The following sections discuss these two issues and the final section of this chapter discusses cost impacts for new and archival document conversion to Adobe® Acrobat®.

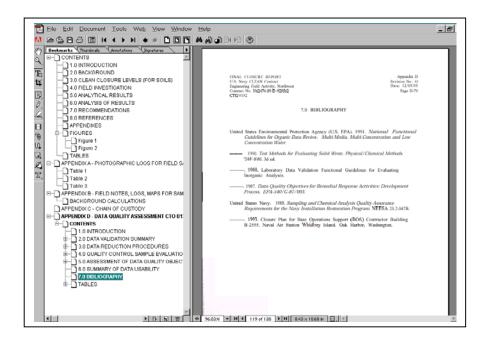
CONVERSION OF NATIVE FILES

Electronic files from nearly any application can be converted to the Portable Document Format (.pdf). These are described in Adobe® Acrobat® software documentation.

Adobe® Acrobat® provides flexibility in how the document appears on screen and how the information is navigated. Included are recommended default parameters for Adobe® Acrobat® documents. The objective is to achieve standard viewing and navigation. Other utilities such as embedding URLs and hyperlinking may be appropriate on a project-by-project basis.

Electronic documents can be converted to .pdf from multiple native formats (see above) and arranged to duplicate the original paper document.

Adobe® Acrobat® automatically generates bookmarks from the table of contents of documents created by most desktop publishing programs. The figure below provides an illustration for document presentation (note hierarchical bookmarks):



IMAGING OF ARCHIVAL PAPER DOCUMENTS

Adobe® Acrobat® is used with a scanner to create a .pdf file from an archival paper document. The resulting file is a .pdf "image only" file or a bitmap picture of the pages that can be viewed but not searched.

To enable the search, correct, and text copy features in an "image only" file, pages can be "captured" and converted to ".pdf normal" during the scanning process. During capture, Adobe® Acrobat® performs optical character recognition (OCR) to the scanned pages. This application converts them to searchable, scalable text called ".pdf Original Image With Hidden Text."

This type of file has a picture of the pages in the foreground, with the captured text behind it. The text can be copied and pasted, searched, or bookmarked while the documents retain the original look, content, handwritten annotations, and signatures. OCR is likely to result in occasional misspellings as images are converted to text. Usually there will be no provisions for proofing and correcting for text accuracy as it is prohibitively expensive.

EXPLANATION OF DOWNLOAD TIMES FOR DIGITAL DOCUMENTS AND FILES

Digital documents may be large, particularly when documents are captured to digital images rather than converted from source files such as MS Word or other authoring programs. It is important to recognize that the time needed to download them can be important.

Time required to download a file considers a standard unit for file size, the difference between bits and bytes (a bit is the smallest digital unit and is represented by 1 or 0), and working through a complicated calculation involving the file size and modem or connection speed.

Calculators exist on the Internet. An example is the File Download Time Calculator. Type in the size of the downloadable file (in KB or MB) and a moment later the program displays download calculations in 17 various transfer speeds/connection types. The File Download Time Calculator is located at:

http://www-sci.lib.uci.edu/HSG/AATimeCalc.html

The table below provides the tabulated speeds for a 1M, 5M, 10M, and 30M file. File sizes and download times are representative of the digital files developed from EFA NW documents. These data indicate that larger documents may be split into chapters and figures in addition to having the entire document available for download.

DOWNLOAD TIME CONSIDERATIONS FOR DIGITAL DOCUMENTS¹

Connection Speed	File Size in Megabytes			
Speed	1M	5M	10M	30M
14,000 bps	$0.10.40^2$	0.53.20	1.46.40	5.20.0
28,000 bps	0.5.20	0.26.40	0.53.20	2.40.0
33,600 bps	0.4.29	0.22.27	0.44.54	2.14.44
56 Kbps	0.2.22	0.11.54	0.23.48	1.11.25
1.54M T1	0.0.5	0.0.26	0.0.53	0.2.40
T2/DS2	0.0.1	0.0.6	0.0.13	0.0.40

¹ Source File Download Time Calculator (http://www.sci.lib.uci.edu/HSG/AATimeCalc.html)*

² Displayed as hours.minutes.seconds

^{*}Source File Download Time Calculator displayed and reprinted with permission from Jim Martindale (jimmartindale-1@lycos.com)<mailto:jimmartindale-1@lycos.com>Copyright © 1994-2002, All rights reserved, Jim Martindale. Please also see Privacy Policy, Disclaimer & Notes, http://www-sci.lib.uci.edu/HSG/Disclaimer.html

ESTIMATED RECORD CONVERSION COSTS/UPDATE

	Cos	of Unit st ¹	Low Cost Total	High Cost Total
150,000	\$0.10 to	\$0.20	\$15,000.00	\$30,000.00
150,000	\$0.10 to	\$0.60	\$15,000.00	\$90,000.00
1,800	\$0.80 to	\$2.50	\$1,440.00	\$4,500.00
1,800	\$0.15 to	\$0.80	\$270.00	\$1,440.00
600	\$0.10 to	\$0.30	\$60.00	\$180.00
25	\$20.00 to	\$70.00	\$500.00	\$1,750.00
25	\$15.00 to	\$25.00	\$375.00	\$625.00
2	\$0.00 to	\$0.00	\$0.00	\$0.00
			\$32,645.00	\$128,495.00
Optional Services:				
	\$30.00 to	\$75.00		
	\$20.00 to \$30.00 to	\$35.00 \$35.00		
	150,000 1,800 1,800 600 25 25	150,000 \$0.10 to 150,000 \$0.10 to 1,800 \$0.80 to 1,800 \$0.15 to 600 \$0.10 to 25 \$20.00 to 2 \$0.00 to Range of Conference (per heigh \$30.00 to \$20.00 to	150,000 \$0.10 to \$0.20 150,000 \$0.10 to \$0.60 1,800 \$0.80 to \$2.50 1,800 \$0.15 to \$0.80 600 \$0.10 to \$0.30 25 \$20.00 to \$70.00 2 \$0.00 to \$25.00 Range of Unit Cost (per hour) \$30.00 to \$75.00 \$20.00 to \$35.00	150,000 \$0.10 to \$0.20 \$15,000.00 150,000 \$0.10 to \$0.60 \$15,000.00 1,800 \$0.80 to \$2.50 \$1,440.00 1,800 \$0.15 to \$0.80 \$270.00 600 \$0.10 to \$0.30 \$60.00 25 \$20.00 to \$70.00 \$500.00 2 \$0.00 to \$25.00 \$375.00 Range of Unit Cost (per hour) \$30.00 to \$75.00 \$20.00 to \$35.00

Range of unit costs are from actual bids of this scope. The winning bid did not contain the lowest cost in all categories.

² Based on lowest and highest unit costs. Actual bids ranged from approximately \$45,000 to \$120,000 and the average of four bids was \$62,000.

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- 2. OSWER Directive 9833.3A-1. Final Guidance on Administrative Records for Selecting CERCLA Response Actions. Dec 3, 1990 (http://www.epa.gov/Compliance/resources/policies/cleanup/superfund/adrec-cerra-rpt.pdf.

WEB SITES

Activities with Administrative Records

USMC Camp Lejeune Administrative Records, http://ams1.mbakercorp.com/lejeune ar/default.asp

USMC Camp Lejeune Installation Restoration Program web site, http://ams1.mbakercorp.com/CampLejeune/default.html

USMC Cherry Point homepage, http://www.lantops-ir.org/cherrypoint/home/

CIMAGETM

CIMAGE™ web page that displays the DOD seal of approval. CIMAGE™ is the NAVFAC corporate imaging system, http://www.cimagenovasoft.com/news/newsreleases/prdod1199.htm

Defense Environmental Network and Information Exchange (DENIX)

Naval Amphibious Base Little Creek. Environmental Quality Division Installation Restoration Program, Mar 1997, http://www.denix.osd.mil/denix/Public/Library/library.html. Environmental Restoration Terms and Acronyms (https://www.denix.osd.mil/denix/Public/Library/library.html. Environmental Restoration Terms and Acronyms (https://www.denix.osd.mil/denix/Public/Library/library.html. It is available in html, MS Word and Zipped MS Word.

Defense Technical Information Center Department of Defense Environmental Cleanup

http://www.dtic.mil/envirodod/

Restoration Advisory Board (RAB) address page, http://www.dtic.mil/envirodod/Stakeholder/WCommunity/SI_WCRAB_Dir.htm

Environmental Law

Cornell Law School Legal Information Institute Environmental Law, http://www.law.cornell.edu/topics/environmental.html

Cornell Law School Legal Information Institute, http://www.law.cornell.edu/

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ISO 9660:1999, http://www.y-adagio.com/public/standards/iso_cdromr/tocont.htm

National Archives and Records Administration

National Archives and Records Administration (NARA) Disposition of Federal Records, http://www.archives.gov/about_us/regulations/part_1228.html

National Archives and Records Administration (NARA) home page, http://www.nara.gov/

National Archives and Records Administration (NARA) Code of Federal Regulations Search on line, http://www.access.gpo.gov/nara/cfr/cfr-table-search.html

Naval Facilities Engineering Service Center

CERCLA ARMS User's Guide,

http://enviro.nfesc.navy.mil/erb/erb a/support/wrk grp/arms/ARMSGuide.pdf

Department of the Navy. Environmental Restoration Plan, http://5yrplan.nfesc.navy.mil

Environmental Glossary and Acronyms, http://enviro.nfesc.navy.mil/erb/acro_gloss/main.htm

NFESC Environmental Restoration and BRAC home page, http://enviro.nfesc.navy.mil/erb/

NAVFAC Headquarters and Engineering Field Divisions/Activities

Naval Facilities Engineering Command, http://www.navfac.navy.mil/

Pacific Division Naval Facilities Engineering Command, http://www.efdpac.navfac.navy.mil/

Southern Division Naval Facilities Engineering Command, http://www.efdsouth.navfac.navy.mil/

Southwest Division Naval Facilities Engineering Command, http://www.efdsw.navfac.navy.mil/home.htm

Atlantic Division Naval Facilities Engineering Command,

http://www.lantdiv.navfac.navy.mil/servlet/page?_pageid=293,867,893&_dad=lantdiv&_schema =LANTDIV

Engineering Field Activity Chesapeake,

 $\underline{\text{http://www.lantdiv.navfac.navy.mil/servlet/page?}} \underline{\text{pageid=4367,4633.4705\&_dad=lantdiv\&_schema=LANTDIV}}$

Engineering Field Activity Northeast,

http://www.lantdiv.navfac.navy.mil/servlet/page?_pageid=4318,4320&_dad=lantdiv&_schema=LANTDIV

Engineering Field Activity North West, http://www.efanw.navfac.navy.mil/efawwwinfo/

Navy Electronic Directives System

Navy Electronic Directives System (the tables for OPNAV and SECNAV instructions are displayed here). SECNAVINST 5212.5D, Navy and Marine Corps Disposition Manual can be found at this site on Table 47, http://neds.nebt.daps.mil/Directives/dirindex.html

Standard Navy Distribution List (SNDL), http://neds.nebt.daps.mil/sndl.htm

U.S. EPA Sites-Overviews of Laws, Superfund, OSWER, etc.

U.S. EPA Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) overview, http://www.epa.gov/superfund/action/law/cercla.htm

- U.S. EPA Laws and Regulations, http://www.epa.gov/oilspill/lawsregs.htm
- U.S. EPA National Contingency Plan (NCP) overview, http://www.epa.gov/oilspill/ncpover.htm
- U.S. EPA National Contingency Plan, summary of key NCP provisions, http://www.epa.gov/oilspill/ncpkeys.htm
- U.S. EPA OSWER home page, http://www.epa.gov/oswer/
- U.S. EPA OSWER Final Guidance on Administrative Records for Selecting CERCLA Response Actions, http://www.epa.gov/Compliance/resources/policies/cleanup/superfund/adrec-cerra-rpt.pdf
- U.S. EPA Superfund Amendments and Reauthorization Act (SARA) 1986 overview, http://www.epa.gov/superfund/action/law/sara.htm
- U.S. EPA Superfund enforcement documents, http://www.epa.gov/compliance/resources/policies/cleanup/index.html
- U.S. EPA Superfund home page, http://www.epa.gov/superfund/index.htm

ACRONYM LIST

AR Administrative Record

ARARs Applicable or Relevant and Appropriate Requirements

ARC Administrative Records Coordinator

ARF Administrative Record File

ARMS Administrative Record Management System

AST Aboveground Storage Tanks

BCP BRAC Cleanup Plan

BRAC Base Realignment and Closure

CAA Clean Air Act

CD-ROM Compact Disc Read Only Memory

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

CHINFO Chief of Naval Information

CLEAN Comprehensive Long-Term Environmental Action Navy

COR Contracting Officer Representative

COTR Contracting Officer Technical Representative

COTS Commercial Off-the-Shelf
CTO Contract Task Order
CWA Clean Water Act

DCN Document Control Number

DECC Defense Enterprise Computing Center
DFAS Defense Finance and Accounting Service
DISA Defense Information Systems Agency

DOD Department of Defense DON Department of the Navy

EBS Environmental Baseline Survey

ECE Environmental Compliance Evaluation

EFA Engineering Field Activity

EFA CHES Engineering Field Activity, Chesapeake, Naval Facilities Engineering

Command

EFA NORTHEAST Engineering Field Activity, North, Naval Facilities Engineering Command

EFA NW Engineering Field Activity, Northwest, Naval Facilities Engineering

Command

EFA WEST Engineering Field Activity, West, Naval Facilities Engineering Command

EFD Engineering Field Division

EPA Environmental Protection Agency
FIS Facility Information System
FOIA Freedom of Information Act
FRC Federal Records Center

GIF Graphics Interchange Format
GIS Geographic Information System

HQ Headquarters

IS Information System

JPEG Joint Photographic Experts Group

LANTDIV Atlantic Division, Naval Facilities Engineering Command

LBP Lead Based Paint

LCM Life Cycle Management

MAGIC Master Activity General Information Control

MHz Megahertz

NARA National Archives and Records Administration

NAVFACENGCOM Naval Facilities Engineering Command

NCP National Contingency Plan

NEHC Navy Environmental Health Center

NFESC Naval Facilities Engineering Service Center NITC Naval Facilities Information Technology Center

NORM Normalization of Data

NPDES National Pollutant Discharge Elimination System

OCR Optical Character Read
O&M Operation and Maintenance

OECA Office of Enforcement and Compliance Activities

OPNAV Chief of Naval Operations

OSRE Office of Site Remediation Enforcement

OSWER Office of Solid Waste and Emergency Response

OWPE Office of Waste Programs Enforcement

PA Preliminary Assessment
PAO Public Affairs Officer

PACDIV Pacific Division, Naval Facilities Engineering Command

PCL Printer Control Language
.pdf Portable Document Format
PRP Potentially Responsible Party
QA/QC Quality Assurance/Quality Control

RAB Restoration Advisory Board

RC Record Conversion

RCRA Resource Conservation and Recovery Act RI/FS Remedial Investigation/Feasibility Study

ROD Record of Decision

RPM Remedial Project Manager

SARA Superfund Amendments and Reauthorization Act

SDWA Safe Drinking Water Act SECNAV Secretary of the Navy

SI Site Inspection SOW Scope of Work

SMP Sample Management Plan

SOUTHDIV Southern Division, Naval Facilities Engineering Command SOUTHWESTDIV Southwestern Division, Naval Facilities Engineering Command

SPCC Spill Prevention Control and Countermeasures

SSIC Standard Subject Identification Codes

SWMU Solid Waste Management Unit

SWP3	Stormwater Pollution Prevention Plan
TIFF	Tagged Information File Format
TSCA	Toxic Substances Control Act
UIC	Unit Identification Code
UST	Underground Storage Tank

APPENDIX A

ADMINISTRATIVE RECORD FILE AUTHORITY BIBLIOGRAPHY

(with web pages when known)

CONGRESSIONAL MANDATE:

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as Amended by the Superfund Amendments and Reauthorization Act of 1986, 42 USC 9601 and Public Law 99-499, Section 113(k), http://uscode.house.gov/title_42.htm. To download add to the URL /download/42C103.doc

National Contingency Plan (NCP) - 40 CFR Part 300, Subpart I, Development and Maintenance of the Administrative Record, U.S.C. S9601

Transfer of Machine Readable Records to The National Archives and Records Administration (NARA), 36 CFR 1228.188 http://www.archives.gov/about_us/regulations/part_1228.html

EPA GUIDANCE RECORDS:

<u>Superfund Community Involvement Handbook EPA 540-K-01-003 April 2002.</u> <u>http://www.epa.gov/superfund/tools/cag/ci_handbook.pdf</u>

Community Relations During Enforcement Activities And Development Of The Administrative Record, OSWER Directive #9836.0-1A, November 1, 1988, http://es.epa.gov/oeca/osre/881103.html

<u>Final Guidance on Administrative Records for Selecting CERCLA Response Actions</u>, OSWER Directive #9833.3A-1 December 3, 1990,

http://www.epa.gov/Compliance/resources/policies/cleanup/superfund/adrec-cerra-rpt.pdf

<u>Superfund Removal Procedures, Public Participation Guidance for On-Scene Coordinators:</u>
<u>Community Relations and The Administrative Record</u>, OSWER Directive #9360.3-05, July 1, 1992 (We have in .pdf; not on web)

EPA Superfund Information Repositories and Administrative Records document number 9836.00-02FS (We have in .pdf, not on web)

<u>Superfund Information Repositories and Administrative Records: Introduction for Librarians</u>, EPA/520-F-92-001, August 1, 1992 (We have in .pdf, not on web)

DEPARTMENT OF DEFENSE GUIDANCE:

DOD Automated Record Conversion Master Plan, Version 1.0, April 1995

Environmental and Natural Resources Program Manual, OPNAVINST 5090.1B, Chapter 15, http://neds.nebt.daps.mil/5090.htm

http://neds.nebt.daps.mil/Directives/5090/fifteen.pdf

<u>Environmental Compliance and Protection Manual</u>, MCO P5090.2A LFL 10 JUL98, Chapter 10, Installation Restoration program,

https://www.denix.osd.mil/denix/Public/Policy/Marine/5090.2A/contents.html

<u>Fiscal Year 1994 - Environmental Management Initiatives Letter</u>, Chief of Naval Operations, 5090 41BJ/930334, December 13, 1993

<u>Life Cycle Management (LCM) Policy and Approval Requirements for Information System (IS) Projects</u>, NAVFACINST 5231.1, March 28, 1994 http://navfacilitator.navfac.navy.mil/docs/files/5231_1.htm

Navy and Marine Corps Policy on the Use of Compact Disc Technology, OPNAVINST 5230.24, November 18, 1993, http://neds.nebt.daps.mil/Directives/5230_24.pdf

Navy/Marine Corps Installation Restoration Manual, Draft, 2001 Update, Chapter 10, Section 10.1-10.3, http://enviro.nfesc.navy.mil/erb/erb a/restoration/ir_manual/Default.htm

Office Of The Secretary Of The Navy And Marine Corps Disposition Manual, SECNAVINST 5212.5D of 22 April 1998,

http://neds.nebt.daps.mil/dispman.htm

Policy Memo #11, SOUTHWESTNAVFACENGCOM, Code 18, 12 December 1994

<u>Public Affairs Guidance on Installation Restoration Administrative Message</u>, Chief of Naval Information (CHINFO) July 1989

Software Evaluation Guide, COMNAVFACENGCOM, October 1991

MISCELLANEOUS:

<u>Freedom of Information Act Guide & Privacy Act Overview, September Edition.</u> U.S. Department of Justice, Office of Information and Privacy, Washington, DC 20530 (for sale from the USGPO; ISBN # 0-16-049784-1), http://www.usdoj.gov/04foia/foiacontacts.htm

APPENDIX B

EXPLANATION OF EPA CATEGORIES

The Administrative Record File Index is organized into categories that roughly follow the chronological process of defining a pollution event, evaluating possible cleanup options, and making a preferred restoration plan available for comment by all interested parties. The terminology may vary among government agencies and applicable regulations, but the same process is being described in all cases.

SITE INVESTIGATION

This category provides background information on the site and surrounding area. Information includes a site summary, a health and safety plan, spill reports, and significant correspondence concerning the site.

REMOVAL RESPONSE

A removal action is either non-time-critical or time-critical. A non-time-critical removal action means that, based on site evaluation, a planning period of six months exists before on-site activities must be initiated. A time-critical removal action means that, based on the site evaluation, a planning period of less than six months exists before on-site activities must be initiated.

REMEDIAL INVESTIGATION

A remedial investigation, by definition, is a long term study which fully defines the scope of the pollution problem, collects data, and determines the technologies and management techniques that may be applied to the site. The investigation evaluates the data regarding the risk to human health and the environment. It is a process that evolves over time as more information is collected which indicates the nature and direction the investigation should take.

FEASIBILITY STUDY

The feasibility study proposes possible remediation technologies to develop the most feasible remediation plan: comply with the nine criteria in the National Contingency Plan (NCP), http://www.access.gpo.gov/nara/cfr/cfr-table-search.html.

HEALTH AND ECOLOGICAL ASSESSMENTS

Health and ecological assessments conducted in the affected area and submitted to government agencies for consideration will be added to the ARF. This includes toxicological profiles and database information, surveys, and correspondence.

RECORD OF DECISION

The actual decision records and records of decision, amendments to them, and relevant correspondence covering federal, state and local government agencies.

EPA AND STATE COORDINATION

Any cooperative or interagency agreements will be in this section. Any formal certification of ARARs or cleanup standards are also recorded here. Other records that demonstrate the coordination efforts among the various government agencies will also be located here

ENFORCEMENT

This section contains historical compliance and legal information about the parties involved in the action, legal orders and decisions, affidavits, letters for access to property, and recordation of compliance with orders.

PUBLIC PARTICIPATION

This category contains public comments and concerns, government responses to those comments, and notification to the public of available information and proposed decisions or actions. Included are fact sheets, news releases, meeting minutes, public notices, public comments, and government responses.

CONGRESSIONAL RELATIONS

This section provides for correspondence from members of the U.S. Congress, transcripts and testimonies regarding Congressional hearings, and published hearing records.

NATURAL RESOURCE TRUSTEE

Sometimes another federal agency wishes to review available data or gather additional data on the site to determine the impact on other natural resources over which they have responsibility. This may include the Department of Interior/U.S. Fish and Wildlife Service, which has authority for the welfare of fish and wildlife in the U.S. Data, reports, correspondence, or action taken will be placed in this category.

GUIDANCE RECORDS AND TECHNICAL SOURCES

Many guidance records and technical resources are consulted when an environmental study is made. Operation and maintenance manuals may be included so the public will better understand the complexities of data gathering, monitoring, and remediation processes.

CONFIDENTIAL FILE

Some records may need to be protected due to the nature of the installation or the type of pollution. However, the law also states that the public has a right to know that there is protected or sensitive information being held. Therefore, the Administrative Record File contains this section which notifies the public of the existence of sensitive records. Only via a special request granted by the Navy and legally cleared, will these records be made available.

POST-DECISION RECORD FILE

Recordation of the implementation of remediation decisions is placed in this part of the Administrative Record File. This file holds key records which may be relevant if a change to the decision is necessary at some point in the future.

This list contains the EPA Category Codes used by the Atlantic Division. It is here as a suggested list, not a mandatory list. The numbers may not necessarily be the same at each EFD/EFA.

ATLANTIC DIVISION MODIFICATION OF U.S. EPA CATEGORY CODES FOR THE ADMINISTRATIVE RECORD FILE

(Note: Reserved means that you can use it for whatever you need it for)

1.0 SITE IDENTIFICATION/BACKGROUND INFORMATION

- 1.1 Correspondence
- 1.2 Background materials reports, RCRA and other information *(note: RCRA information has been moved to 16.0)
- 1.3 Notification Documents
- 1.4 Preliminary Assessment Report
- 1.5 Initial Assessment Study
- 1.6 Site Inspection Reports
- 1.7 Previous Operable Unit Information
- 1.8 Historical Data Reports
- 1.9 Work Plans, Project Plans, Health & Safety Plans
- 1.10 Area of Concern Documents/Reports
- 1.11 Hazardous Ranking Scoring Information/Reports
- 1.12 Relative Risk Ranking

2.0 REMOVAL RESPONSE

- 2.1 Correspondence
- 2.2 Work Plans, Project Plans
- 2.3 Sampling & Analysis Plans
- 2.4 Sampling and Analysis Data/Chain of Custody Forms

- 2.5 EE/CA Report
- 2.6 Action Memorandum/Decision Document
- 2.7 Amendments to the Action Memorandum
- 2.8 Removal Response Reports
- 2.9 Health & Safety Plans

3.0 REMEDIAL INVESTIGATION

- 3.1 Correspondence
- 3.2 Meeting Minutes
- 3.3 Sampling & Analysis Plans
- 3.4 Sampling & Analysis data/Chain of custody forms
- 3.5 Work Plans/ Project Plans
- 3.6 QA/QC Plans
- 3.7 Health & Safety Plans
- 3.8 Reserved
- 3.9 Reserved
- 3.10 Progress Reports
- 3.11 ARARs Information
- 3.12 Risk Assessments
- 3.13 Remedial Investigation Reports
- 3.14 Reserved
- 3.15 Supporting Remedial Investigation Reports
- 3.16 Photographs/pictures

4.0 FEASIBILITY STUDY

- 4.1 Correspondence
- 4.2 Reserved
- 4.3 Sampling & Analysis Plans
- 4.4 Sampling & Analysis Data/Chain of Custody forms
- 4.5 Work Plans
- 4.6 ARARs Determination/Information
- 4.7 Treatability Studies/Site Characterizations
- 4.8 Feasibility Study Reports
- 4.9 Proposed Remedial Action Plan/Proposed Plan
- 4.10 Supplements & Revisions to the Proposed Plan
- 4.11 Supporting Investigative Feasibility Study Reports
- 4.12 Health & Safety Plans

5.0 HEALTH ASSESSMENTS

- 5.1 Correspondence
- 5.2 ATSDR Health Assessments
- 5.3 Toxicological Profiles
- 5.4 Health Risks Reports

6.0 RECORD OF DECISION (ROD)

- 6.1 Correspondence
- 6.2 Plans Reports
- 6.3 Basis of Design
- 6.4 Record of Decision Documents
- 6.5 Amendments to Record of Decision Documents

- 6.6 Explanation of Significant Difference
- 6.7 Long-Term, Semiannual, Quarterly Monitoring Reports
- 6.8 Site Close Reports
- 6.9 Decision Documents
- 6.10 Project Plans Reports
- 6.11 Work Plans
- 6.12 Supporting Reports (Remediation)
- 6.13 Operation and Maintenance Manuals
- 6.14 Land Use Control Implementation Plan/Land Use Control Assurance Plan (LUCIP/LUCAP)
- 6.15 Supporting Land Use Reports or Materials
- 6.16 Five Year Review Reports

7.0 STATE COORDINATION

- 7.1 Correspondence/Partnering Information
- 7.2 Federal Facilities & State Contracts
- 7.3 DSMOA Documents/MOU Documents
- 7.4 Reserved
- 7.5 Reserved
- 7.6 Site Management Plans

8.0 FEDERAL COORDINATION

- 8.1 Correspondence
- 8.2 Federal Facilities Agreement Documents
- 8.3 Penalty Documents
- 8.4 Enforcement Records/Documents

- 8.5 Department of Justice Referral Documents
- 8.6 Reserved
- 8.7 EPA Administrative Orders
- 8.8 EPA Consent Orders
- 8.9 Reserved
- 8.10 Progress Reports
- 8.11 National Priorities List Documents (including Federal Register notice)
- 8.12 State Consent Orders

9.0 PUBLIC PARTICIPATION

- 9.1 Correspondence
- 9.2 Mailing list for Technical Review Committee and Restoration Advisory Board members*
- 9.3 List of the members of the Technical Review Committee and Restoration Advisory Board
- 9.4 Technical Review Committee and Restoration Advisory Board meeting minutes*
- 9.5 Community Relations Plan (Document)
- 9.6 Public Comments on Documents and Department of the Navy response to comments
- 9.7 Public Notices (newspaper, journals, base newspapers, etc.)
- 9.8 Public Meeting Transcripts
- 9.9 Documentation of any other Public Meetings
- 9.10 Fact Sheets and Press Releases other than Public Notices
- 9.11 Newspaper article pertinent to the Installation Restoration Program
- 9.12 Late Comments made by the general public
- 9.13 Technical Assistance Grants information
- 9.14 Community Reuse Program Reports

10.0 CONGRESSIONAL RELATIONS

- 10.1 Correspondence
- 10.2 Transcripts
- * Please see page 17 regarding handling of these documents.
 - 10.3 Testimony before Congress
 - 10.4 Published Hearing Records

11.0 NATURAL RESOURCE TRUSTEES

- 11.1 Correspondence
- 11.2 Notices
- 11.3 Findings of facts
- 11.4 Reports

12.0 TECHNICAL SOURCES AND GUIDANCE DOCUMENTS

- 12.1 Correspondence
- 12.2 U.S. EPA Guidance Documents
- 12.3 State Guidance Documents
- 12.4 U.S.Navy/USMC Guidance Documents
- 12.5 Technical Source Guidance Documents
- 12.6 Other guidance documents
- 12.7 Military Installation history documents

13.0 REMEDIAL DESIGN/REMEDIAL ACTION

- 13.1 Correspondence
- 13.2 Sampling & Analysis Plans/Data
- 13.3 Work Plans/Progress Reports
- 13.4 ARARs Information

- 13.5 Remedial Action Reports
- 13.6 Interagency & Cooperative Agreements
- 13.7 Remedial Design Reports
- 13.8 Reserved

14.0 BASE REALIGNMENT AND CLOSURE (BRAC)

- 14.1 Correspondence
- 14.2 BRAC Information
- 14.3 Base Closure Team (BCT) information/meeting minutes
- 14.4 Operations & Maintenance (O&M) documents
- 14.5 Property Information
- 14.6 Long-Term Maintenance (LTM) documents
- 14.7 Work Plans & data
- 14.8 BRAC Reports
- 14.9 Environmental Baseline Surveys Plans
- 14.10 Environmental Baseline Reports

15.0 RESERVED

16.0 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) INFORMATION

- 16.1 Correspondence
- 16.2 Notification Part A/Part B/Permit Modifications
- 16.3 RCRA Facility Assessment (RFA) Report
- 16.4 RCRA Facility Inspection (RFI) Report
 - 16.4.1 Sampling & Analysis data
 - 16.4.2 Corrective Action Management Plan/Site Management Plan
 - 16.4.3 Work Plans
 - 16.4.4 Interagency/Federal Facility Agreements

- 16.4.5 ARARs
 16.4.6 Health/Endangerment/Risk Assessment Information
 16.4.7 Interim Measures
- 16.5 RCRA Enforcement Action
- 16.6 Quarterly Monitoring Reports
- 16.7 RCRA Corrective Measures Study (CMS)
 - 16.7.1 Sampling & Analysis data
 - 16.7.2 Scope of Work
 - 16.7.3 Work Plan
 - 16.7.4 ARARs Initial Screening
 - 16.7.5 Treatability Studies/Site Characterization
 - 16.7.6 Proposed Plans for selected Remedial Action
- 16.8 RCRA Statement of Basis
 - 16.8.1 Correspondence
 - 16.8.2 Responsiveness Summaries
 - 16.8.3 Scope of Work
 - 16.8.4 Work Plans
 - 16.8.5 Interagency or Federal Facilities Agreements
 - 16.8.6 ARARs
 - 16.8.7 Statement of Basis
- 16.9 RCRA Corrective Measures Implementation (CMI)
 - 16.9.1 Correspondence
 - 16.9.2 Sampling & Analysis Data
 - 16.9.3 Scope of Work
 - 16.9.4 Work Plans/Progress Reports
 - 16.9.5 Interagency & cooperative agreements
 - 16.9.6 ARARs
 - 16.9.7 Corrective Measures Design/Construction Implementation
- 16.10 Reserved

This list contains the EPA Category Codes used by Engineering Field Activity North West. It is here as a suggested list, not a mandatory list. The numbers may not necessarily be the same at each EFD/EFA. The first 12 categories are actually EPA categories, and some of the sub-categories may have been modified to fit EFA NW filing needs. Categories 13 - 22 are categories which have been added for the RPMs in the IR group. Categories 27 - 52 are the files which were created for EFA NW Compliance documents.

ENVIRONMENTAL FILE INDEX

SF 1.0	IR SIT	TE IDENTIFICATION (PA/SI)
	01.1	Correspondence
	01.2	Background
	01.3	Notification/SI/CERCLA
	01.4	PA Report
	01.5	SI Report
	01.6	Previous OU Information
	01.7	Action Plan
	01.8	Site Inspection Scope
SF 2.0	<u>IR IN </u>	TERIM REMEDIAL MEASURES/REMOVAL RESPONSE
	2.1	Correspondence
	2.2	Sampling and Analysis Plans
	2.3	ATA/Chain of Custody
	2.4	EE/CA Approval Memorandum
	2.5	EE/CA
	2.6	Remedial Action Memorandum
	2.7	Amendment to Action Memorandum
	2.8	Remediation Studies
SF 3.0	IR RI/	FS (REMEDIAL INVESTIGATION/FEASIBILITY
	STUD	$\underline{\mathbf{Y}}$)
	3.1	Correspondence
	3.2	Scopes of Work
	3.3	RI/FS Project Plans
	3.4	ATA/Chain of Custody
	3.5	ARAR Determination
	3.6	RI/FS Reports and IR Natural Resources Ecological Risk Assessments
	3.7	Proposed Plan
	3.8	Treatability Studies
	3.9	Right of Entries (AGREE)
	3.10	Comments

IR ROD (RECORD OF DECISION)

SF 4.0

	4.1	Correspondence				
	4.2	ROD				
	4.3	Amendments to ROD				
	4.4	Explanations of Significant Differences				
SF 5.0	IR EPA/STATE COORDINATION					
	5.1					
	5.2	FFAs and IAGs				
	5.3	DSMOAS				
SF 6.0	ENFO	<u>PRCEMENT</u>				
	6.1	Correspondence				
	6.2					
	6.3	Endangerment Assessments				
	6.4	Administrative Orders				
	6.4.1	Other Orders				
	6.5	Consent				
	6.6	Affidavits				
	6.7	Technical Discussions with PRPs				
	6.8	Notice Letters and Responses				
	6.9	Legal Documents				
SF 7.0	IR HEALTH ASSESSMENTS (ATSDR)					
	7.1	Correspondence				
	7.2	ATSDR Health Assessments				
	7.3	Toxological Profile				
SF 8.0	<u>IR NA</u>	ATURAL RESOURCE/ECOLOGICAL RISK ASSESSMENT				
	8.1	IR Tribal Coordination				
	8.2	Notices Issued				
	8.3	Findings Of Fact				
	8.4	Reports				
SF 9.0	IR CC	NGRESSIONAL HEARINGS/INQUIRIES				
	9.1	Correspondence				
	9.2	Transcripts				
	9.3	Presentations				
SF 10.0	IR PU	BLIC PARTICIPATION (TRC/RAB MEETINGS)				

2 Community Relations Plan					
3 Technical Review Committee/RAB Meetings					
Public Notice Of Availability Info					
5 Public Meeting Transcript					
Documentation of Other Public Meetings					
7 Fact Sheets and Press Releases					
Responsiveness Summary					
2 Late Comments					
10 Correspondence					
11 Newspaper/Journal Entry					
ΓΕCHNICAL/GUIDANCE SOURCES					
EPA Headquarters Guide					
2 EPA Regional Guidance					
3 State Guidance					
4 Technical Sources					
5 Guidance Documents					
BASE CLOSURE AND REALIGNMENT ACT OF 1988 (BRAC)					
BRAC Clean Up Plan (BCP)					
2 Environmental Baseline Survey (ESB)					
Real Estate					
4 Environmental Impact Statement					
5 BRAC Clean Up Team (BCT)					
6 Correspondence					
REMEDIAL DESIGN					
l Correspondence					
2 Remedial Designs/Plans					
REMEDIAL ACTION – CONSTRUCTION					
l Correspondence					
2 RA Project Reports					
RA Construction Closure Reports					
REMEDIAL ACTION – MONITORING/OPERATIONS					
l Correspondence					
2 Monitoring/Operations Workplans					
Monitoring/Operations Reports					

SF 16.0	IR INSTITUTIONAL CONTROLS
	 16.1 Correspondence 16.2 Institutional Control Plans 16.3 Institutional Control Reports
SF 17.0	<u>IR 5-YEAR REVIEW</u>
	17.1 Correspondence17.2 5-Year Review Reports
SF 18.0	IR RESPONSE COMPLETE AND LONGTERM MANAGEMENT/SITE CLOSURE AND DELISTING
	 18.1 Correspondence 18.2 Response Complete 18.3 Long-Term Management 18.4 Site Closure 18.5 Site Delisting
SF 20.0	IR CONTRACTORS/ FIELD WORK INSPECTIONS
SF 21.0	MILCON PROJECTS ON IR SITES
SF 22.0	GRAPHICS ON IR SITES
SF 27.0	AIR
	 27.1 Notice Of Construction Permits 27.2 Air Toxics 27.3 Air Emissions 27.4 Venting 27.5 Ozone Depleting 27.6 Title V/ Synthetic Minor Permitting 27.7 Conformity 27.8 O & M Plans
SF 28.0	ASBESTOS
SF 29.0	DRINKING WATER (SWDA, POTABLE WATER)
	 29.1 Lead/Copper in Drinking Water 29.2 Groundwater Wells 29.3 Drinking Water Analysis 29.4 Water Conservation

SF 30.0	ENVIRONMENTAL PROGRAM MANAGEMENT (PCR'S, NECA, BAM, POM, COOKBOOK, EPRS)
	30.1 Multimedia Environmental Plans
SF 31.0	NAVY INSPECTIONS (ECES, RISK SURVEYS, IG. INSPECTION, FEAT ETC.)
	 31.1 Major Claimant ECE/Risk Survey 31.2 Activity Self Audit 31.3 Navy Inspector General (IG) Inspection
SF 32.0	EPA AND STATE INSPECTIONS (NOVS, COMP AUDITS AND AGREEMENTS)
	 32.1 Notices of Violation (NOVS) 32.2 Environmental Compliance Agreements 32.3 EPA Multimedia Inspections
SF 33.0	HAZARDOUS MATERIAL/HAZARDOUS SUBSTANCE (SARA, TITLE III, EPCRA, AUL)
SF 34.0	HAZARDOUS WASTE (RCRA, HW PERMITS, HW DOCKET)
	 34.1 Hazardous Waste Annual Report 34.2 Hazardous Waste Management Plan 34.3 RESERVED 34.4 Used Oil (Off Spec Fuels) 34.5 Lead Based Paint 34.6 Hazardous Waste Permit 34.7 RCRA Closures
SF 35.0	PCBS (TSCA)
SF 36.0	POLLUTION PREVENTION
SF 37.0	RADON
SF 38.0	SOLID WASTE (LANDFILLS, GARBAGE, REFUSE, RECYCLING)
	38.1 Recycling 38.2 Medical Waste
SF 39.0	SPILL PREVENTION AND CONTINGENCY PLANNING, (SPCC, OSCP, A2R2, NATIONAL RESPONSE TEAM)

	39.1 A2R2 39.2 SPCC Plan
	39.3 Spill Contingency Planning
	39.4 Spill Messages
	39.5 Coast Guard Operations Manuals
SF 40.0	<u>UST (UNDERGROUND STORAGE TANKS, LUST)</u>
	40.1 UST Notification Forms and Permits
	40.2 UST Management Plans
	40.3 UST Removals
	40.4 UST/Petroleum Contaminated Sites
SF 41.0	WASTEWATER (NPDES PERMITS, STATE WASTEWATER DISCHARGE PERMITS, SEWAGE, POTW, NOTW, STORMWATER)
	41.1 Stormwater
	41.2 Pre-Treatment/Industrial Wastewater
	41.3 Oily Wastewater
	41.4 Discharge Monitoring Reports
SF 42.0	NATURAL RESOURCES MARINE, TERRESTRIAL/
	ENDANGERED THREATENED SPECIES
SF 43.0	WATER QUALITY (DREDGING, CORPS OF ENGINEER PERMITS
	HYDRAULIC APPROVALS)
	43.1 Water Quality
	43.2 Shoreline and Coastal Zone Management
SF 44.0	SHIPS/SHIPBOARD WASTES/OCEAN DUMPING
SF 45.0	<u>NOISE</u>
SF 46.0	RESERVED
SF 47.0	HEALTH AND SAFETY
SF 48.0	SOIL QUALITY
SF 49.0	RESERVED
SF 50.0	RESERVED
SF 51.0	ENVIRONMENTAL PROPERTY ASSESSMENT

SF 52.0 <u>FUDS (FORMERLY USED DEFENSE SITES)</u>

APPENDIX C

LESSONS LEARNED

ARF CONTENT

Indexing

Create an index and ensure it contains a detailed list of the contents of each ARF. Indexing is critical to retrieving records. Correct and consistent indexing of records allows for more efficient record retrieval, whether paper, CD-ROM, fiche, film, or optical disk platter. Indexing creates a populated database.

Compliance Documents

Compliance documents are not a contingency record—disposition is 30 years from date issued. The activity/owner of the document is the base. The EFD/EFAs do not keep compliance documents. However, experience has shown that if you have a site moving in and out of CERCLA, keeping the compliance records for that site keeps you a step ahead when the site moves from RCRA to CERCLA. There is a benefit to keeping the RCRA and UST paper file just as if you are creating an ARF. Even though RCRA and UST do not require an ARF, it is a good idea to create one. The RCRA and UST sites can bounce in and out of CERCLA, which does require an ARF.

ELECTRONIC FILE CHARACTERISTICS

File Size

When dealing with large files, it is recommended that the file size be kept at 10 megabytes at this time, especially when our customers need to download information. As technology progresses, this may be overcome by events.

OCR (Optical Character Read)

It is recommended that files be Optical Character Read (OCR) when scanned into .pdf. OCR is recommended at that point (before the CD is burned) because the process cannot be done later.

Suggested Fonts for Scanning

Certain fonts are easier to scan and convert to OCR. Arial 11 is the best to use.

Portable Document File (.pdf) Format

The team recommends using portable document file (.pdf) format.

Suggested Names for Electronic Files

When naming .pdf electronic files on the CD or any electronic format, it is recommended that 8 characters (four ALPHA characters, three or four numbers or digits) be used.

Keywords and EPA Category Codes

Keywords and EPA category codes are not necessary if files have been OCR'd and are converted to .pdf.

TIF Files

The team does not recommend using TIF, as TIF makes each page a separate file. If documents have been OCR'd, OCR will not work if the documents are converted to TIF files. There are additional costs involved to redo the OCR.

Navy Owned Equipment/Data for WEB Use

One EFD/EFA purchased a server for the CLEAN contractor to use, and to post information for them on the web. It will be given to the next CLEAN contractor when the contract ends. This way the computer hackers cannot hack back into the Navy files from a Navy server. It is off site.

Multiple CDs

If the ARF has to be put on more than two CDs, it becomes unwieldy for the customer to search and use. If possible, the team recommends displaying the information on a web site or server rather than distributing multiple CDs.

ATLANTIC DIVISION LESSONS LEARNED REGARDING CONVERSION OF PAPER ARF TO CD-ROM

BACKGROUND

The Atlantic Division (LANTDIV) librarian began to investigate the possibility of converting the Administrative Record Files (ARF) for 15 bases, which LANTDIV manages, to an electronic format early in 1994. The first objective was to use this technology as a future means to make the ARF more accessible in a timely manner to the general public, lawyers, and state and federal agencies that need to use it as well as LANTDIV personnel. The second major objective was to ease the burden on repositories that housed the ARF. Most are libraries that did not have the shelf space to store the paper copies that are constantly expanding.

Lesson #1 - Investigate what has already been done at the activity.

Lesson #2 - Find out what guidelines exist for your project and follow them (agency and other). Use guidance in this document and any internal policy that your respective EFD/EFA has in place.

In 1993, the Atlantic Division librarian began investigating the options available. At that time, there were no guidelines within the U.S. Navy to do the conversion nor were there any Department of Defense (DOD) initiatives to convert the ARF. The ARFs for military installations differ from civilian ARFs. For non-federal facilities, a single site will be listed (i.e., one industrial landfill will become one site; if there are three landfills, each becomes a "site"). Federal facilities with multiple sites are listed as a single "site." The Atlantic Division chose to develop a master Administrative Record for the entire federal facility (site). This includes all applicable information on all sites at each facility. The U.S. EPA has issued organizational guidelines for non-federal facility paper ARFs which the Atlantic Division adapted to use for federal facility ARFs.

Lesson #3 - Look at every conversion system available; talk to vendors and listen to presentations in order to make the best decision for your organization.

Lesson #4 - Review/preview every type of software that you can in order to make a selection.

Lesson #5 - Select the appropriate way for your organization to convert the ARF to an electronic format.

Lesson #6 - Coordinate with the ADP department; invite them to send a representative to your committee.

Lesson #7 - Begin with a pilot project; create a prototype.

Lesson #8 - Distribute the prototype to a wide audience; encourage feedback.

Lesson #9 - Test the prototype to the limit; make prolific notes and then test again and again.

Lesson #10 - Be prepared to solve new problems because the opportunity to do so will present itself.

CORE	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	DATABASE INPUT STANDARDS	OTHER INFORMATION
CORE	Author	Text	30	Name of originator (person, firm) of the record. Use only first author. Can be "signature" field.		*See footnote
CORE	Author Affiliation	Text	30	Firm, naval installation, etc. Same as "from" field		*See footnote
CORE	Contract Number	Text	15	Contract number refers to the Department of the Navy contract under which the record was produced.	(i.e., N68711-89-D- 9296)	*See footnote
CORE	*Cut-Off Date	Date	10	Date a certain action has taken place.		
CORE	Number of Pages	Numeric	4	Number of pages or approximate number of pages.	(i.e., 0004, 1123)	
CORE	Owner	Text	1 to 5	Owner (EFD/EFA, custodian, originator) of record who maintains control of inputted record. Application automatically entered when owner logs in and enters record(s).	FIS Codes R = SWESTDIV, EFANW, & EFAWEST S = SOUTHDIV N = NORTHDIV L = LANTDIV C = EFACHES P = PACDIV NORM Codes CHES, LANT, NORTH, NWEST, PAC, SWEST, SOUTH, WEST	If you use EFD/EFA list from MAGIC, it is a one character code. If you use list in NORM, it is a five character field. *See footnote

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

CORE	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	DATABASE INPUT STANDARDS	OTHER INFORMATION
CORE	*Process Date	Date	10	Date record was entered into the index.		Can be generated automatically.
CORE	Recipient	Text	30	Name of the recipient (person, firm, agency) of the record. Multiple recipients to be listed individually. Same as "To" field.		*See footnote
CORE	Recipient Affiliation	Text	30	Firm, naval installation, etc. Same as "signature" field.		*See footnote
CORE	Record Date	Date	10	Date indicated on the record being entered. Dates must contain month/day/year. If record has only year, use 01/01/ for month day. Use 01/01/0000 for non-dated records. Do Not leave blank; accommodate year 2000.	(i.e., 01/01/1997, 01/01/0000, 01/02/2000)	
CORE	Record Number	Numeric	10	A sequential number automatically assigned when adding a new record.		Field used uniquely by each EFD/EFA. *See footnote.
CORE	SITEID	Text	10	A computer generated number from the Facility Information System (FIS) which contains the official Navy Site Register List. This number will not change unless the sites are split or the activity gets an additional UIC for BRAC purposes.		Used as a key for linking to other databases. *See footnote

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

CORE	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	DATABASE INPUT STANDARDS	OTHER INFORMATION
CORE	Sites Addressed	Text	10	Site(s) which are addressed in the document.	(i.e., SITE 00010, UST 000023, SWMU 00045, AOC 12, CAOC 34, GROUP B)	*See footnote
CORE	Title/Description	Text	255	Title of record ACTUAL or ASSIGNED. Do not leave blank.		*See footnote
CORE	Unit Identification Code Number	Text	6	Unit Identification Code (UIC) number is assigned to specific base by Defense Finance and Accounting Service (DFAS); it is an alphanumeric, six text character field. Do Not leave blank.	(i.e., N68711, N00246, N00251)	* UICs can be pulled from existing databases. See footnote.

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

OPTIONAL	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	DATABASE INPUT STANDARDS	OTHER INFORMATION
OPTION	Building Number	Text	10	Number designating a structure.	Bldg. 01234	Used as a key for linking to other databases. *See footnote
OPTION	CD-ROM Number	Numeric	3	Identifies which CD-ROM contains record.		
<i>OPTION</i>	Classification/ Locator	Text	16	Identifies the classification of record and whether the document is an Admin Record, Information Repository, etc.		
<i>OPTION</i>	Comment Field	Memo	Varies	Memo field to be used as required.		Memo field length varies whether using text or memo field; determined by software package.
<i>OPTION</i>	Delivery Order Number	Numeric	4	Delivery Order (DO) number is usually identified on the document. If not identified on document, insert zeros in field.		*See footnote
OPTION	Disposition Date	Date	10	Date that record is to be disposed.		
OPTION	EPA Category Number	Numeric	5	Document category according to U.S. EPA guidance (OSWER DIR 9833.3A-1).	(i.e., 01.02, 10.12)	*See footnote

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

OPTIONAL	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	DATABASE INPUT STANDARDS	OTHER INFORMATION
OPTION	*Location	Text	18	Physical location of where the record is located.		*See footnote
OPTIO N	Operable Units Addressed	Text	10	Operable Units which are addressed in the Record.	OU 0000001	*See footnote
OPTION	Record Type	Text	20	Description of record type.	(i.e., Letter, Report, Memo, Fax, Workplan, Mtg Minutes, Data, Maps, etc.)	*See footnote
OPTION	Special Area Code	Text	2	A unique two character code identifying areas in the Navy that do not have a UIC established in the Master Activity General Information Control (MAGIC) mainframe program. The program resides at Defense Information Systems Agency (DISA), Defense Enterprise Computing Center (DECC), Mechanicsburg, PA.		JA stands for Jackson Park Family Housing. The special area is attached to MAGIC UIC N00251, Puget Sound Bremerton. This field may be overcome by events as more activities are assigned a UIC.
OPTION	*SSIC Number	Text	16	Standard Subject Identification Code in accordance with SECNAVINST 5212.5C		*See Footnote
OPTION	Subject/ Keywords	Text	255	Words or phrases, separated by commas, describing document.		*See footnote

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

OPTIONAL	FIELD NAME	FIELD TYPE	NUMBER OF CHARACTERS	FIELD DESCRIPTION	 OTHER INFORMATION
OPTION	Task Order	Numeric	4	Contract Task Order (CTO) number is usually identified on the document. If not identified on document, insert zeros in field.	*See footnote

^{*}Each EFD/EFA can predefine their pull down menus. Standardization is achieved by importing from existing databases (NORM, MAGIC, FIS, DFAS, etc.)

APPENDIX E

GLOSSARY

TERMS AND DEFINITIONS USED IN THE INSTALLATION RESTORATION PROGRAM

ADMINISTRATIVELY CONFIDENTIAL

Please consult with counsel to obtain guidance if this phrase is either within a document or stamped on a document. This term does not seem to be a legal term, but may be used by the EPA in their documentation. The definition can change as courts render decisions. There is a need to examine each usage in the context in which it arises to determine the meaning of the terms the EPA uses. It depends on the context in which they are viewed.

AR

Administrative Record. The administrative record is a legal file containing the records upon which the lead agency bases the selection of a response action and on which judicial review of response actions will be based. The administrative record contains technical reports specific to each Superfund site, and key technical and administrative guidance for cleanups. An administrative record must be available at or near the site to encourage public participation in the remedy selection process.

ARF

Administrative Record File. The ARF refers to the records as they're being established and maintained. Until a response action decision has been selected, there is no complete administrative record for that decision. Thus, to avoid creating the impression that the record is complete at any time prior to the final selection decision, the set of records is referred to as the ARF rather than the AR. A file that contains all information used in order to make decisions on the selection of a response action under CERCLA. Available for public review and comment.

ARARs

Applicable and Relevant or Appropriate Requirements. State or Federal statute or regulation that pertains to protection of human health and the environment.

ATTORNEY/CLIENT WORK PRODUCT

Please consult with counsel for guidance to obtain an opinion if confronted with this phrase on any document(s). This terms does not seem to be a legal term, but may appear in a document, or may be stamped on a document. This term is sometimes used by the EPA. EPA's regulations, for example, state that the attorney client privilege applies to any communication between an attorney and his client. However, many cases involving the government since EPA regulations were published limit the privilege. The privilege is limited depending on whether the communication contemplated litigation, if the attorney was involved in the generation of the document, or if the document was simply copied. The definition can change as courts render decisions. There is a need to examine each usage in the context in which it arises to determine the meaning of the terms the EPA uses.

ATTORNEY WORK PRODUCT

Counsel needs to examine the documents that may be the result of an attorney/client relationship before they are included in the ARF. EPA's regulations, for example, state that the attorney client privilege applies to any communication between an attorney and his client. However, many cases involving the government since EPA regulations were published limit the privilege. The privilege is limited depending on whether the communication contemplated litigation, if the attorney was involved in the generation of the document, or if the document was simply copied. The definition can change as courts render decisions. There is a need to examine each usage in the context in which it arises to determine the meaning of the terms EPA uses.

BOOKMARK

For documents that are scanned and converted to .pdf format, bookmark has the following definition: Bookmarks are assigned divisions and/or reference points within a document. Bookmarks are usually compiled or organized in a manner similar to a table of contents, corresponding to chapters or sections of a document. The Adobe® Acrobat® plug-in and Reader allow the user to display all bookmarks in a separate frame (usually to the left of the window that contains the body of the text) organized like a table of contents.

The cost for creating bookmarks and hyperlinks is approximately equivalent on a per link/bookmark basis since they are both created using Acrobat® Distiller® software. While the keystrokes and mouse clicks used to create hyperlinks are different than bookmarks, the total time spent creating them is approximately the same. Most scanning contractors charge an hourly fee for creating bookmarks and hyperlinks, so the cost (and

to some degree the unit cost) will vary according to the total number of links/bookmarks required per document.

CERCLA

Comprehensive Environmental Response, Compensation and Liability Act. The original 1980 act setting up the "Superfund" for hazardous waste site cleanups nationwide.

CLEAN

Comprehensive Long-term Environmental Action Navy. A broad multi-year environmental contract.

COMPENDIUM

Guidance documents which are frequently used in selecting response actions, but are not generated for a particular site for which the record is being compiled may be kept and maintained at a central location.

CONFIDENTIAL DOCUMENTS

Check with counsel, and depending upon the context in which the document is viewed, counsel can determine if it should be included in the ARF. The document may or may not have a "CONFIDENTIAL" classification actually stamped on it, but could contain sensitive information, such as archeological information. The definition can change as courts render decisions. There is a need to examine each usage in the context in which it arises to determine the meaning of the terms the EPA uses.

If the document is stamped "CONFIDENTIAL," check with counsel for guidance before including it in the ARF. Refer to page 21, "ARF Records that Require Special Handling" for assistance.

CORRESPONDENCE

Any official letters, memorandums, notes, telecommunications, and any other forms of addressed, written, communications sent and received by the EFD/EFA or other sources. Internal Department of Navy (DON) drafts and related internal memorandum should not be included in the AR unless they contain information found nowhere else that is considered or relied upon in the CERCLA response action decision. Drafts that are circulated outside of DON for review (e.g., to the regulators or the public) shall be included in the AR as well as the comments received by DON from those entities (and DON response to those comments).

DOCUMENT MANAGEMENT

The ability to store and retrieve documents in a centralized facility that is accessible to all. This includes being able to capture, store, retrieve, display, edit, manipulate, distribute and process the document.

FACILITY

Any building, structure, base, equipment, pipe or pipe line, well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft; or any site where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise come to be located. The term "site" is used synonymously with the term "facility" at National Priorities List (NPL) bases.

FOR OFFICIAL USE ONLY (FOUO)

Check with counsel for guidance if a document is marked FOUO, and it appears to be information that might become part of the ARF.

HYPERLINK

For documents that are scanned and converted to .pdf format, hyperlink has the following definition: Links embedded in the body of a document, that if clicked, open another file, document, or application, or jump the reader to another location within the document. The hyperlinks are usually represented as underlined text with a color differing from the rest of the text in the body of the document. Hyperlinks can also be assigned to graphical images or diagrams contained within the body of the document.

The cost for creating bookmarks and hyperlinks is approximately equivalent on a per link/bookmark basis since they are both created using Acrobat® Distiller® software. While the keystrokes and mouse clicks used to create hyperlinks are different than bookmarks, the total time spent creating them is approximately the same. Most scanning contractors charge an hourly fee for creating bookmarks and hyperlinks, so the cost (and to some degree the unit cost) will vary according to the total number of link/bookmarks required per document.

INFORMATION MANAGEMENT

The administration of information, its use and transmission, and the application of theories and techniques of information science to create, modify, or improve information handling systems. The term is frequently used in reference to data-based information systems in computer environments, where the information is stored electronically.

IR

Information Repository. An information repository is where current information, technical reports, and reference materials regarding a Superfund site are stored. The repository is established in the community at the beginning of site studies to provide the public with easily accessible information. Repositories are established for all sites where cleanup activities are expected to last for more than 45 days. Typical repository locations include public libraries, town halls, municipal offices, etc.

IRP

Installation Restoration Program. The Department of Defense program to assess and clean up old hazardous waste sites with funding from Environmental Restoration, Navy (ERN) and Base Realignment and Closure (BRAC) Restoration Funds.

KNOWLEDGE MANAGEMENT

Who knows what (information), and how to share that information with others.

PRIVILIGED DOCUMENTS

Please check with counsel for guidance. Counsel can make a determination as to include them or not in the ARF. This term is sometimes used by the EPA interchangeably with confidential. EPA's regulations, for example, state that the attorney client privilege applies to any communication between an attorney and his client. However, many cases involving the government since EPA regulations were published limit the privilege. The privilege is limited depending on whether the communication contemplated litigation, if the attorney was involved in the generation of the document, or if the document was simply copied. The definition can change as courts render decisions. There is a need to examine each usage in the context in which it arises to determine the meaning of the terms the EPA uses.

RECORD

All books, papers, maps, aerial photographs, architectural or engineering drawings, photographs, machine readable materials, or other documentary materials regardless of physical form or characteristics made or received by an agency of the United States Government under federal law or in conjunction with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government.

RECORDS MANAGEMENT

<u>Definition 1</u>: A means to manage a document during its entire life cycle. The creation or receipt of a document, the maintenance and use of a document, and the disposition of a document. The ability to know what documents exist regarding a particular subject, where they are located, what media they are stored on, who owns them, and when they should be destroyed.

<u>Definition 2</u>: The application of systematic and scientific controls to recorded information required in the operation of an organization's business. A professional management discipline that is primarily concerned with the management of document based information systems, most of which are in paper media format.

REDACT

Redact can mean to edit a document, revise a document, or to make a document ready for publication. Documents in the ARF may need to be redacted (rewritten or summarized) if the ARF document contains privileged or confidential material. Please refer to Reference 2, under Confidential and Privileged Documents, which explains how to handle the document. 40 CFR Section 300.805(a)(4): If a document is excluded from the public portion of the record file based on privilege, the relevant information should, to the extent feasible, be extracted and included in the public record file. This can often be accomplished by deleting or redacting the privileged information from the document. Please refer to Reference 2, Section III.H, page 34.

RUN TIME CAPABILITY

A self-contained CD-ROM. All software is loaded on the CD.

SECRET

The definition of this term changes as courts render decisions. Counsel needs to review the documents, and depending on the context in which they are viewed, can make a determination as to include them or not in the ARF.

APPENDIX F

SAMPLE INSTRUCTION FOR IMPLEMENTING AND MAINTAINING THE COMPREHENSIVE ENVIRONMENTAL RESTORATION COMPLIANCE LIABILITY ACT (CERCLA) ARF AND COMPENDIUM AT THE EFD/EFA

Insert EFD/EFA INSTRUCTION

NUMBER

Insert DATE

ENVIRONMENTAL WORK INSTRUCTION (Insert Instruction Number)

To: All Area Focus Teams (Insert name change as required)

- Subj: IMPLEMENTING AND MANTAINING THE COMPREHENSIVE ENVIRONMENTAL RESTORATION COMPLIANCE LIABILITY ACT (CERCLA) ADMINISTRATIVE RECORD AND COMPENDIUM AT (insert EFD/EFA name)
- Ref: (a) Office of Solid Waste and Emergency Response (OSWER) Directive #9833.3A-1, Environmental Protection Agency Guidance on Administrative Records for Selecting CERCLA Response Actions, December 3, 1990
 - (b) CERCLA Administrative Record Management System (ARMS) User's Guide, UX-XXXX-ENV Month, 2000 (under revision)
 - (c) Navy and Marine Corps Installation Restoration Manual, February 1997 (under revision)
- Encl: (1) CERCLA Administrative Record Management System (ARMS) User's Guide, UX-XXXX-ENV Typical Administrative Records, Typical Remedial Action Document list
- Encl: (2) CERCLA ARMS User's Guide, UX-XXXX-ENV Typical Administrative Records, Typical Removal Action Document list
 - (3) CERCLA ARMS User's Guide, UX-XXXX-ENV, Include Documents if Considered or Relied On
- 1. <u>PURPOSE</u>: The purpose of this instruction is to ensure that (insert EFD/EFA name) Administrative Record (AR) and Administrative Record File (ARF) meet the requirements listed in references (a) through (c).
- 2. **CANCELLATION:** Not Applicable.

3. **DISCUSSION:**

- a. As lead agency, (insert EFD/EFA name) is responsible for establishing and maintaining the original AR in accordance with references (a) through (c).
- b. The original AR shall be maintained by the (insert EFD/EFA name and division, branch, etc).

4. **APPLICABILITY**: This instruction is applicable to the Installation Restoration Program (IRP).

5. **PROCEDURE:**

- a. Remedial Project Manager (RPM) Responsibilities:
 - 1. Review and evaluate documents for inclusion into the ARF. Documents include, but are not limited to, facsimilies, e-mails, incoming and outgoing correspondence, etc. See Enclosures (1) through (3) for documents to consider for inclusion.
 - 2. Ensure the original document is signed.
 - 3. Ensure the original document contains all pages (includes enclosures, attachments, appendices, etc.,)
 - 4. Provide the original document to the Administrative Records Coordinator (ARC). (If there is no ARC, insert designated point of contact.)
 - 5. All original incoming and outgoing correspondence pertaining to the IRP shall be forwarded to the ARC. (If there is no ARC, insert designated point of contact.)
 - 6. Provide guidance documents (referred to as the Compendium) that are frequently referred to during the decision making process to the ARC. (If there is no ARC, insert designated point of contact.)
- b. Administrative Record Coordinator Responsibilities:
 - 1. Review and evaluate records received for inclusion into the ARF.
 - 2. Verify that each record contains all pages, enclosures, attachments, appendices, etc. The ARC will obtain any missing pages or sections prior to cataloging into an automated register.
 - 3. Search for records identified as missing.
 - 4. Eliminate all duplicate records.
 - 5. Catalogue records into an automated register.
 - a. Processing into an automated register requires that each record be labeled, filed, and stored. Special handling may be required for records containing analytical and sampling data, confidential or privileged information, photographs, or electronic or magnetic media.

- b. Paper records are filed and stored sequentially by the unit identification code (UIC) number and an assigned sequential record number, or
- c. Paper records are filed and stored by the EPA category code.
- 6. Determine required number of copies and coordinate with the RAC, CLEAN and other contractors for appropriate distribution (ARF, activities, information repositories, etc.)
- 7. Maintain a complete Compendium.
- 8. Provide various current printed reports upon request.
- 9. Provide assistance in updating the Information Repositories.
- 10. Review RAC and CLEAN contract closeout packages to ensure appropriate records have been included into the ARF.

SIGNATURE TYPED NAME

Distribution: Team Leaders RPMs RTMs ALnOs Counsel EICs, etc.

APPENDIX G

OSWER MODEL CERTIFICATION

PURPOSE

The model certification on the next page is a representation of the form that accompanies the AR, when the AR is subpoenaed as the basis for judicial review for a response action. The signed form states the attached documents constitute the administrative record.

CERTIFICATION/SIGNATURE AUTHORITY

Please refer to Section K, Certification, in the <u>Final Guidance on Administrative Records</u> for <u>Selecting CERCLA Response Actions</u>, OSWER Directive #9833.3A-1, December 3, 1990, for guidance regarding certification and signature authority.

(This form is Appendix K in the <u>Final Guidance on Administrative Records for Selecting CERCLA Response Actions</u>, OSWER Directive #9833.3A-1, December 3, 1990.)

MODEL CERTIFICATION

IN THE [NAME OF COURT]

UNITED STATES OF AMERICA	A, :
Plaintiff, :	
v. :	
: [NAMES OF DEFENDANTS]	:
: Defendants, :	CIVIL ACTION NO.
[number] : v. :	
:	_
[NAMES OF THIRD PARTY DEFENDANTS]	:
Third Party Defendants	:

CERTIFICATION OF DOCUMENTS COMPRISING THE ADMINISTRATIVE RECORD

The Department of the Navy hereby certifies that the attached documents constitute the administrative record for selection of response actions under the Comprehensive Environmental Response Compensation and Liability Act of 1980, as amended, for the [name of site] site in [City or County], [State].

By the Department of the Navy:

In witness wh	ereof I have	e subscribed my
name this	day of	, 19
in [city]	•	
[signat	ure	
	-	
[typed	name]	